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THE FCC'S LOW POWER FM POLICY: STATION PERSONNEL'S INTERPRETATION OF
POLICY OBJECTIVES AND ITS IMPACT ON IMPLEMENTATION

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ABSTRACT

Social policies are means by which the government ensures every member of the community certain minimum standards of living and a degree of equality in opportunities for pursuing important life goals. However, social policies are only effective if the problems are clearly defined. Evaluation of policy implementation is an important stage of the policy process because it helps in measuring the outcomes of the policy and comparing them to policy objectives. Evaluation helps in modifying implementation of ongoing policies so that they are more successful in achieving their objectives or, in case a program that have already reached its' termination, add to the public policy knowledge base.

The Federal Communication Commission (FCC) initiated the Low Power FM (LPFM) service in 2000 in an attempt to increase diversity and localism in the public platform. The policy launched two non-commercial services - LP10 and LP100. These low powered stations were expected to satisfy highly local interests that were not being fulfilled by the full power commercial and non-commercial radio stations. It was a means for small local community based organizations to communicate over the airwaves, encourage diverse voices and help linguistic and cultural minorities or groups with shared civic or educational interests. It has been thirteen years since its inception and the time has come to examine if the LPFM policy is making progress in its agenda to introduce more localism and diversity in the media.

In this study, three types of LPFMs – general interest, religious and minority – have been compared to understand how these LPFMs interpret the goals of the policy and if they actively work toward achieving them. Both minority and general interest LPFMs were selected because they represented the objectives of diversity and localism in LPFM policy. Religious LPFMs were selected not only because religious organizations have carved a niche for themselves in the LPFM

community, but also because their presence has been felt and debated frequently by media scholars.

As part of this research, FCC's documents were studied to better understand the LPFM policy objectives in order to compare them with the goals set by LPFM licensees for their radio stations. Interviews were conducted with LPFM personnel to explore how the minority, general interest and religious communities' stations described and included their community in operations of and content creation for their radio station, whether they used the resource to provide content different from the mainstream media, and whether they have succeeded in fulfilling their community's information needs and have become media hubs for their communities. As a source of additional information, the available websites of LPFMs included in the study were examined to understand how they addressed their audience, and if their programs catered to only the entertainment needs of their community or were they providing information too, as well as how far LPFMs were involved with their communities.

Analysis of all the documents collected revealed that the three different types of LPFMs are using their low power radio stations differently. While religious LPFMs concentrate only on spiritual development of its listeners, general interest LPFMs either provide entertainment or are very involved with spreading social awareness on health, finance and politics. In case of minority LPFMs, some differences were observed between minority religious LPFMs – religious LPFMs that either catered to a minority community or were owned by a minority community, and non-religious minority LPFMs. While the non-religious minority LPFMs played a very important role in the community providing employment, health, religious information along with legal advice and news, the religious minority LPFMs focused on spiritual development and to a lesser degree, on education, health and family. However, unlike religious LPFMs, minority religious LPFMs were more socially aware, and more connected with their community, some of them even

advertising community projects. Hence, although they were focused on religion, they also had programs about employment, health, finance, and family relationships.

The study concluded that minority LPFMs were most successful in providing for their community's needs while some general interest LPFMs, were relevant for their community. Religious LPFMs, however, displayed a disinterest in using their LPFMs to their full potential and were satisfied to provide gospel and religious teachings.

The study concluded that although LPFM policy has a lot of potential, the FCC needs to better define its goals and objectives, and put in place guidelines and parameters to help LPFMs licensees provide the service that FCC envisioned from its LPFM policy.

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Chapter 1

Introduction

In United States, the first amendment of the Constitution mandates freedom of speech, through its declaration that “Congress shall make no law ... abridging the freedom of speech, or of the press(.)” The question has, however, arisen periodically whether the government can act affirmatively to create opportunities for speech, for various unrepresented groups in order to encourage true diversity of opinion in the media (Napoli, 2007). Diversity of opinion is not only an attempt to give different communities a platform to express their points of view and perspectives, but expose the majority community to all manners of opinion that help it in becoming more informed and allow it to make balanced decisions and participate in the democratic process (Napoli, 2007). Regulators have made efforts from time to time - such as through the reform of minority ownership rules in 1978 - to provide media platforms to minority communities, the marginalized and small groups to express opinions, gather information, create group identity, address conflicts specific to their groups and present their side of an issue.

In the year 2000, the Federal Communications Commission (FCC) initiated a new program to license Low Power Frequency Modulation (LPFM) radio stations, in an effort to “serve very localized communities” (Report and Order, 2000, p.4) and benefit “linguistic and cultural minorities or groups with shared civic or educational interests that may now be underserved by advertiser-supported commercial radio and higher powered noncommercial radio stations” (FCC, 2000, p. 9). By 2009, 800 LPFM stations (Dunbar-Hester, 2010, p. 3) were operating, many of them affiliated with religious organizations, schools and universities, but also including those that targeted minority communities. Though scholars are generally in agreement

that the initiation of LPFMs was a positive move toward media reforms and would help bring in social justice (McChesney, 2004; Johnson & Menichelli, 2007; Greene, 2008), the policy has also been criticized for frequent changes made during the process of policy making and implementation that has led to lack of financial viability due to a non-commercial orientation (Lucas, 2006; Powell, 2001), and the preponderance of religious broadcasters (Lucas, 2006; Connolly-Ahern et. al, 2008; Goetz, 2006).

With its stated goals of promoting localism and encouraging marginalized and minority voices in society, the FCC's LPFM policy is an instance of what has been termed "social policy." Social policies perform an important task of "redistributing resources" in society (Korpi, 1980, p. 297); they are ways of bringing about changes to encourage equality and wellbeing in a community. Policy formation in media, as in other fields, is also generally guided by a notion of 'public interest', which democratic states are expected to pursue on behalf of their citizens. This raises questions about how one should judge the success of a social policy such as the FCC's LPFM program, and if the "attention should be focused on fidelity to the designer's plan or on the general consequences of the implementation actions when determining success?" (Matland, 1995, p. 154). This is a relevant question in the case of LPFMs because, as several scholars have already argued, there is evidence that the LPFM program's goals underwent several changes between the time the program was designed and the time it was implemented (Lucas, 2006; Hamilton, 2004; Wikle & Comer, 2009)

This dissertation is an assessment of the implementation of social policies and uses the LPFM program as a case study. It builds on and adds to the existing literature by focusing attention on how key stakeholders interpret program objectives in the implementation phase, and thus affect program outcomes. Policies addressing "social problem areas" have been described as having four aspects – "theory, implementation, evaluation, and resource/system support" (Wandersman, 2009, p. 1). Implementation is an important aspect of the policy process as the

“quality of implementation is crucial to achieving results” (Wandersman, 2009, p. 1) and the implementation process fails if the policy is sound but is not put “properly in place.” In the case of social policies, implementation can present special challenges because policy makers have to rely on heterogeneous stakeholders with diverse interests and perspectives to implement policy. The central authority may have the “information, resources and sanction capabilities to help enact the desired policy” (Matland, 1995, p. 161), but it may still be unable to affect program outcomes unilaterally, because instructions and goals often get distorted as they are disseminated and distilled through different levels of the policy network. Even if the message has been described in great detail by the sender, it may still be interpreted differently by the receiver since “cognitive dissonance may lead to selective perception” (Matland, 1995, p.162). Evaluation is thus an important step in making policies more effective and informing policymakers “what works and why” (Sanderson, 2000, p.434).

Low Power Frequency Modulation stations (LPFMs)

The FCC has made several attempts to provide platforms to encourage diverse voices such as The Fairness Doctrine, The Ascertainment Program, Equal Employment Programs, and Minority Ownership. A study researching these measures revealed that most of these policies have loopholes that have prevented them from achieving their goals. For example, in case of The Ascertainment Program and Fairness Doctrine, the policy does not explain what kinds of programs cater to the needs of a minority community. Similarly, the Equal Opportunity and Minority Ownership policies have not explained how increase in employment of or ownership by members of minority community will increase in minority programming since employees do not have influence over programming decisions, which are made on the basis of factors such as commercial viability. In addition, these policies do not aid the non-organized and non-recognized

minorities, and is further affected by the fact that the definition of minority is “problematic and under-theorized” (Horwitz, 2004, p. 1).

Moreover, loopholes do not need to be in the policy to affect its chances of success negatively, factors - such as political influences like in case of Dutch media policy on cultural diversity that changed from supporting minority voices to supporting cross cultural programs that catered to various social groups; contradictory policies that cancel out each other respective objectives; real world factors such as in case of children’s programming policy, where parent’s ignorance about program ratings and mandatory educational programs affected policy benefits - influence the policy objectives as well.

The LPFM policy, initiated in 2000, is the latest attempt by the FCC to increase the participation of marginalized, under-represented and local groups in the public platform. However, the LPFM policies have undergone several changes that, for some experts, limited its potential to a large degree (Lucas, 2006; Hamilton, 2004; Wikle & Comer, 2009). For example, during the policy formation stage, media activists and small entrepreneurs of LPFMs argued for the service to be small commercial stations as the LPFMs were planned as “minority economic development project(s)” (Lucas, 2006, p. 62).

The LPFM policy has been examined by various scholars to understand how the low power radio stations have helped in giving a voice to the voiceless. Some studies found that the LPFMs failed to help marginalized and under-represented communities such as new immigrant groups, and that the radio stations running illegally before the inception of LPFMs were more experimental in their content and had a less rigid approach to programming. Some studies have questioned the noncommercial aspects of the LPFM service and examined the kind of groups such as religious organizations that have made extensive use of this service, while another study has argued that instead of increasing diversity and local voice on the public platform, the LPFM policy has provided a standardized format for broadcasting. One scholar discussed the non-

commercial aspect of LPFMs that have robbed it of “innovation, initiative and funding” (Lucas, 2006, p. 63), while another critic questioned the merit of the LPFM agenda and if it is big enough to justify creating problems for the existing broadcasters (File, 2000).

On the other hand, scholars have found merit in the LPFM initiative, with some researchers calling the LPFM stations a place for a community to gather information and a positive move toward media reform, and hence to social justice. The successful implementation of LPFM policy has taught social activists to come together to promote tangible reform proposals, it has been looked at as a method of community empowerment.

Implementation evaluation research in LPFMs, have questioned the role LPFMs play in the lives of its community members. Recent studies (Connolly-Ahern, Schejter & Obar, 2009 & 2012), concentrating on the religious LPFMs, revealed that the “hands off deregulatory approach” has led to an “outright abuse of policy goals” (Connolly-Ahern, Schejter & Obar, 2012, p. 39). The study revealed that although LPFMs are meant to provide a platform for local and underrepresented voices, sometimes affiliation with a national network leads to rebroadcast of programming through LPFMs that has nothing to do with the local community. For example, a substantial number of religious LPFMs operators do not identify themselves with a “local geographical community” but broader network with shared values and interests. The study concluded that religious networks already have a substantial presence in the commercial broadcasting industry and have taken advantage of FCC’s “naïve notion that limiting the LPFM licenses to non-profit entities would in itself lead to localizations and avoid conglomeration and the emergence of networking programming” (Connolly-Ahern et al., 2012, p. 41).

The LPFM policy is a much debated topic among scholars, while the initial wave of research in this area concentrated on the policy itself and the way changes in the policy could affect the achievement of policy goals. Recent policy research, especially after almost a decade of the LPFM policy initiation, has concentrated on evaluating whether LPFMs have been able to

achieve its policy goals. Although there have been a few studies on how religious LPFMs are serving their local community, there has not been, till now, a study that explores the performances and goals of general interest, religious and minority LPFMs to compare if any of them is actually successful in achieving the objectives of the policy. This research attempts to answer questions such as how well LPFMs perform when they are being used for the purposes of diversity and localism, and how the employees, owners and volunteers of general interest, religious and minority LPFMs understand and interpret the policy goals differently. Unlike the previous studies that concentrated on whether LPFMs – religious and general interest – are successful in providing local content, one of the clear objectives of LPFM policy, this study will examine how LPFM operators use the radio stations and if their aims reflect the goals set by the policy makers, and if any of these types of LPFMs have attempted to and succeeded in fulfilling the information needs of the community they cater to. This study especially focuses on the minority radio stations to understand whom minority, marginalized, and underrepresented groups consider their audience and what their community's needs are, how they use the radio station to fulfill these specific needs that are not being fulfilled by the commercial broadcasters.

This comparative study examines what role, if any, low power FM stations have played in creating diversity and encouraging the emergence of minority voices since its inception and how policies directed toward minorities, marginalized, and local groups perform in the real world and the manner in which the various stake holders such as the owners, managers, DJs and the audience experience and make use of this opportunity. In one of its earliest documents discussing the LPFM initiative, Notice of Proposed Rule Making, the FCC states that LPFMs are designed to serve three purposes – address the needs of community; foster opportunities for new radio broadcast ownership; and promote additional diversity in radio and program voices. This study explores how community stakeholders are interpreting these program objectives. The following research questions are framed.

Research questions

Although there have been studies on the potential of LPFM in creating diversity and encouraging localism, and experts have also examined the manner in which LPFMs are contributing to their geographical community, there have been no studies that examine how LPFM policy has performed in the last decade in encouraging minority voices and hence diversity, in the public forum. This study will concentrate on judging the performance of LPFMs in creating diversity of opinion and find answers to the following research questions.

RQ1: How do LPFM operators define the communities they serve?

While all broadcasters are licensed to serve a particular geographical community, they may choose to focus on a wider or narrower target demographic. How do LPFM operators define themselves? How do the LPFMs contribute to the collective experience of the community?

RQ2: How do LPFM stations operators ascertain, define and participate in the political, linguistic and cultural, social, religious and financial interests of their community?

RQ3: What function do the LPFMs fulfill in their communities through their programming?

How is the programming content of the LPFM station specific to the community it is serving? How does the programming reflect the intention of the LPFM operators to serve the political, social, cultural and economic interests of their communities? How do LPFM operators determine what is important for their community and translate these goals into public service objectives for their stations?

RQ4: How, if at all, are the FCC's goals of increasing diversity and encouraging localism being addressed by the general interest, religious and minority LPFMs? How do the three different kinds of LPFMs interpret and implement the goals set by the FCC?

An outline of the method

Evaluation scholars use a variety of research methods to “measure the effectiveness of operating programs” (Rutman, 1980, pg. 17). There are four main evaluation methodologies – post-positivism, pragmatism, interpretivism, and critical normative science (Green, 1994, p.531). Post positivism, the dominant tradition in the history of program evaluation, is designed to evaluate macro policy issues of program effectiveness and cost efficiency by using tools such as experiments and system analysis. Pragmatism aims to provide information for program decisions and is targeted at mid-level managers and administrators and comprises structured and non-structured surveys to understand which parts of a policy work well and which need to be improved. Interpretivism makes use of qualitative approaches to increase program understanding for the stakeholders and increase the values of pluralism and aim at program improvements. This methodology is targeted at program directors and beneficiaries. The final approach, critical normative science, addresses ideas of emancipation, empowerment and social change. In critical normative research, stakeholders participate in various qualitative and quantitative designs and methods such as historical analysis and social criticism.

Although most scholars use post-positivism and critical normative methodologies to evaluate policies, interpretivism is the most suitable method to study how the stakeholders themselves interpret, assimilate and implement the program objectives, and adapt it to their particular circumstances. This method, by making use of a purely qualitative methodology, tries to examine the experiences of different stakeholders with a particular policy. In this method, the social reality is separated from scientific realism and works on the assumption that social reality is in constant process of change, of interpretation and reinterpretation, and the truth is neither objective fact nor a subjective opinion, but is found in the interaction of the two. The interpreter uses his/her preconception to guide the process of inquiry. The inquiry leads to interaction

between human subjects and the interpreter that leads to forming of new perceptions for both the parties (Greene, 2007). Interpretivism is different from the method of positivism, in which it is assumed that “objective” data collected by the researcher can be used to test prior hypotheses or theories. While positivism works on an assumption that science is a superior way of knowing and a scientist is a credible researcher, interpretivism is a hermeneutical process that makes use of interpretation and perception of an experience to make judgment that are based on both objectivity and subjectivity. The interpretive evaluation method works on the assumption that “knowledge of reality, including the domain of human action, is a social construction by human actors” (Walsham, 1995, p. 376).

This study makes use of the interpretivist policy evaluation method to explore how policies are understood by the targeted beneficiaries because it allows for interpretations and subjective opinion. The interpretivist framework turns the spotlight on one set of stakeholders and studies how they made sense of program goals, and implemented them in their personal spheres of work. In evaluating LPFM policy, the interpretivist framework helps to understand if and to what extent the operators and managers of LPFMs have succeeded in achieving the goals of giving voice to the small, marginalized and minority communities in the thirteen years since its implementation and how have the LPFM owners, general managers and directors re-interpreted these goals to suit their missions and needs. Emergence of local and minority voices through LPFMs cannot be judged only by the number of radio stations that are either owned by or cater to local or minority communities and neither can it be judged solely by the opinions of policy makers and minority activists.

This study would research the LPFM policy to understand how its goals are interpreted by the target group—the LPFM radio station owners, managers and DJs—and how are they achieving their own goals through this policy. It would explain how this opportunity of operating a low power, non-commercial stations is being used by the local and minority community. The

study will reveal not only whether the policy has been successful in increasing the number of radio stations that are oriented toward the local or minority community, but also whether the policy has been successful in helping these communities to use the radio stations in a progressive and meaningful manner and introduce diversity in the public sphere. Therefore, if the LPFMs owned by local and minority community continue to air content that is available in the mainstream media without adding the minority discourse in a meaningful manner, then the LPFM policy has failed to achieve its goal no matter how many LPFM stations are owned by or run for the local, marginalized and minority communities.

The interpretivist approach “interpret(s) the meanings and actions of actors according to their own subjective frame of reference” (William, 2000, p. 210) and looks for information related to preferences, motivations and actions that are not numerical by nature, which is then combined “into system of beliefs to comment on the general principles or relationships” (Lin, 1998, p. 165). To use this framework for the LPFM initiative, the study analyzes the official documents issued by FCC – and available at the Commission’s website (www.fcc.gov) - to understand the goals and objectives of the LPFM policy; conducts interviews of the owners, managers, disc jockeys (DJs) of three types of LPFM stations - minority-oriented, those catering to the local community (general interest) and religion; analyze the mandates of radio stations that are available on individual LPFM station websites to comprehend the unique goals and agendas that LPFM licensees are trying to fulfill through their radio stations; and examine how these mandates and mission statement posted in the radio websites are translated into content and how the community is allowed to participate in the LPFMs. Furthermore, the study analyzes the websites of the three types of LPFM stations to understand how the radio station owners, volunteers and employees present their radio station to people living outside the community they serve and how they use the Internet to support their goals and objectives.

By analyzing the responses of the interviewees, the study explores whether these LPFM stations target a particular community consciously; the manner in which they describe the community; and are they different from the mainstream media because of their content or format? The study examines whether minority-oriented LPFM stations serve the minority community in a meaningful way, such as by addressing the problems faced by the community and/ or introducing issues that are specific to their cultural and social identity. In addition, the study examines whether the LPFM stations – minority, general interest and religious - participates and contributes in the political, cultural and economic life of the community that they serve, such as do the DJs of the LPFM stations initiate political debates and what role, if any, the stations play in the economic life of the community.

By examining the official documents and interviewing the radio station workers, the study determines whether the LPFMs have succeeded in achieving the goals set by the FCC and meeting the expectations of its supporters.

The chapters in this dissertation are arranged as follows. Chapter two explains the definitions and objectives of social policies, the importance of implementation stage in the policy process, and the significance of evaluation of policies to understand how implementation changes the nature of the policy from the way it was designed, and how goals set by the policy makers and designers are fluid and influenced by the circumstances in which they are implemented. This chapter also reviews the literature on LPFM policy to understand what aspects of the policy are being debated by other scholars and how other academics judge the LPFM initiative.

Chapter three examines the history of LPFMs and the significant policy developments, and social and technological changes that led to the initiation of the LPFM service. It discusses the first efforts at minority radio stations – the Class D service – and the Telecommunications Act of 1996, which led to consolidation of resources in the radio industry into the hands of few corporate networks and created a need for diversity of media sources in the public platform. The

chapter also deliberates on various aspects of LPFM policy, the numerous changes it went through that brought the LPFM policy to where it stands today.

In Chapter four, methodology for the research is discussed such as the type of sample used and the method of selecting the relevant LPFMs for the comparative study. This chapter also analyzes the primary documents, the interview questions, the reasons for examining the LPFM websites, and the format of analysis. The methodology chapter analyzes the official documents and discusses the interview questions that have been used to collect information from LPFM operators, owners and volunteers.

Chapter five will discuss the finding of the data collected in detail, discuss the three different types LPFM stations on factors such as programming, audience response, source of content, and stated goals and objectives of selected LPFMs to understand how they relate to and benefit the community they are serving. It will also explain the conclusions drawn from the research and how it answers the research questions posed at the beginning of the dissertation to understand whether the LPFM policy has fulfilled its objectives of increasing diversity, encouraging local voice, and empowering marginalized communities.

Chapter six will contain the recommendations for the LPFM policy and the topics of future research. It will also discuss the limitations of this study.

Chapter 2

Literature Review

The LPFM initiative is part of social policy, intending to provide small and marginalized groups with a public platform and give them a chance to engage the air waves to address the issues that the community as a whole is interested in. In order to understand the motivation behind the initiative, the nature of and need for social policy, the existing literature and the opinions of other scholars regarding the LPFM policy is discussed at length in this chapter.

Policy

Policies are designed by the government as rules to divide resources fairly and equally among its citizens. These policies help in understanding the issues that are the focus of the government and the direction that the government intends to take with its concerns. The term “public policy” has been defined in many ways. A simple definition of public policy is “whatever governments choose to do or not do” (Dye, 1987, p. 1). It has been broadly defined as “the actions, objectives, and pronouncements of governments on particular matters, the steps they take (or fail to take) to implement them, and the explanations they give for what happens (or does not happen)” (Wilson, 2006, p.154). More specifically, public policies are defined as “purposive course of action or inaction undertaken by an actor or set of actors in dealing with a problem or matter of concern” (Anderson, 1994, p. 5). Public policy is “purposive and goal-oriented” and “is made by public authorities”; and it “consists of patterns of actions taken over time”; public policy is a product of demand, “a government-directed course of in response to pressure about some perceived problem” (Smith, 2010, p.5). One expert divides policy theorists into two groups - the

institutionalists, those who view public policy as “benign component of identified rules and procedures” - and the *behaviorists*, those who think public policies are the “result of the interaction of powerful forces, some of which may be far removed from the halls of government” (Gerston, 2010, p.5). Public policies are directed toward a group and community to either regulate their actions or provide them with opportunities. These policies help the government provide its people a socially stable and fair system that will support them with social and economic issues. Policy is “determined by Government to intervene in the life of the community” (Titmuss, 1974, p.143).

Forming a subset of public policy are policies that seek to provide opportunities and amenities to communities, which are called social policies. Social policy is “the desire to ensure every member of the community certain minimum standards and certain opportunities” (Hagenbuch, 1958, p. 205). Some social policies “are based on the notion of moral progress...brought about by a fusion of intelligence and concern for social justice and equality” (Titmuss, 1974, p.143). These policies have three objectives – firstly, they “aim to be beneficent” and “are directed to provide welfare for citizens”; secondly, they include “economic as well as non-economic objectives” – such as “minimum wages, minimum standards of income maintenance and so on”; and finally, they involve “some measures of progressive redistribution in command-over-resources from rich to poor” (Titmuss, 1974, p. 144). They are “an attempt to steer the life of society along channels it would not follow if left to itself” (Lafitte, 1961, p.9).

As with public policy, social policy does not have one accepted definition. It is mostly defined in socially beneficial or morally relevant terms. It is “not a technical term with an exact meaning... it is taken to refer to the policy of governments with regard to action having a direct impact on the welfare of the citizens, by providing them with services or income” (Marshall, 1965, p.7). The success of social policy is dependent on a clear understanding of the problems that it aims to resolve as “effective social policy is built on the cornerstone of careful problem

definition” (Marshall, 1965, p.7). Therefore, the definition and explication of a social problem are the bases on which “claimants develop consensus that their needs deserve special attention” (Chapin, 1995, p. 507).

The policy making process

All policies, including economic and social policies, are conceptualized as following a number of distinct stages in the theory commonly called the “stages heuristic” (Sabatier, 1999, p. 6-7). In the stages heuristic, the policy process is divided into a sequence of stages - agenda setting; policy formulation; implementation; and evaluation. In agenda setting, a problem emerges in the public consciousness as a result of media coverage of a controversy or crisis, and eventually finds a place on the public policy agenda if it succeeds in competition with other emergent problems. Policy formulation follows on the basis of consultations and negotiations with multiple stakeholders, differing in the degree of their political power, mobilization and negotiating skill. Various policy options (including the choice not to act) might be considered at this stage, with one eventually emerging as the chosen solution. Once a policy action is chosen, the next stage is implementation. A different set of policy actors might be brought into play in the implementation phase, in addition to the original decision-makers – these implementers might involve governmental agencies as well as actors outside government such as non-profit groups, businesses, community organizations and citizens. The final element of the stages heuristic is evaluation, where the actual outcomes of the policy are measured and compared to the policy intent, after the lapse of a certain period of time. Policy implementation might be modified in the case of ongoing programs based on periodic evaluations; alternatively, if the program has already reached termination, evaluation studies add to the fund of public policy knowledge and thus guide the design of future policies and programs.

After legislators have made a formal declaration of policy intent in the form of legislation, the objectives of the law have to be translated into action. This stage of policy implementation is difficult as it needs to be divided into two stages – understand the goals of the policy and find ways to implement the policy to achieve the goals. Even when the legislation is not “unambiguous about what should be done”, it “tends to be light on the specifics of how to do it” (Smith, 2010, p. 253). Regulatory agencies are typically charged with the responsibility to take the legislative intent and formulate and supply the details of rulemaking. For this purpose, public hearings and advisory committee board meetings are held, public comments are encouraged and registered, and stakeholders with competing agendas lobby with the government for their interests. The rulemaking process is “of necessity, methodical and time-consuming precisely because a deliberative process tends to be associated with some degree of legitimacy” (Shulman, 2005, p. 625). This process of policy implementation encourages public participation in ironing out the details so that their suggestions help the policies yield generally positive results (Shulman, 2005, p. 624). Why some options are selected over others and why some interest groups are able to influence the policy process to a greater extent than others are relevant areas of research because of “increased political participation by larger portions of the public, government decisions assumed greater importance and legitimacy” (Gerston, 2010, p. 4). Some scholars have analyzed the relationship between government institutions, public and interest groups (Richardson, 2006; Hall, 1993; Grande, 1996), while other experts have explored the influence of diverse forces such as political parties and public opinions on government (Burstein, 2003; Smith, 1999; Stimpson, Mackuen & Erikson, 1995).

Once the stage of regulatory rulemaking is complete, actual implementation on the ground requires inputs from various agents who are equally important as the policy designers. Hence, the success of policy is dependent on both governmental and non-governmental operators and “the implementation of new programs at the national level requires U.S. public administrators

to be prepared to work with a variety of different kinds of actors both within and without government—actors drawn from different organizational cultures, influenced by different sets of incentives, and directed toward different goals” (Hall & O’Toole, 2004, p.190).

Therefore, several organizations, independent agents, and even the public are responsible for successful implementation of a policy. Except for few exceptions, “multiple agencies, governments, and/or sectors are regularly involved in the processes necessary to convert policy into practice” (Hall & O’Toole, 2004, p.190). This complex process of policy implementation needs a fine tuned system that both understands what the policy’s goals are and is aware of the importance of successful implementation of the policy. After the rules have been adopted, the passage of legislation leads to “even more ambitious coordination requirements than do the original laws” (Hall & O’Toole, 2004, p. 203). The policies usually are just the bare outlines of what the government intends to do and filling out these outlines, which “are also somewhat more specific and tangible” (Hall & O’Toole, 2004, p. 203), are the different agents that make this policy a reality.

This dissertation is an examination of the process of policy implementation of the LPFM program. It focuses relatively less attention on the agenda-setting and policy formulation stages of the LPFM program, concerning itself more with the processes by which policy intents, as embodied in regulatory decisions, are translated into action in the implementation phase and the different techniques that might be used to perform evaluation of programs post-implementation. To set the stage for an evaluation of the LPFM implementation, the next section discusses prior literatures on policy implementation and evaluation.

Prior literature on policy evaluation

The outcome of even the best planned and best supported policy initiative can be dismal if the policy has not been implemented properly. Reforms often turn disappointing as they are

designed by different technocratic experts, who look at policy in a very different manner. For example, while the economists emphasize markets, incentives and production functions, the sociologists are caught up in scientific management and “Weberian notions of hierarchical authority and bureaucratic control” (McLaughlin, 1987, p. 171). The political process of implementation and the outcomes of the policies or reforms are generally disregarded or overlooked.

On the one hand economists look at disappointing policy outcomes as market failures and offer incentives, on the other hand the sociologists blame the inadequate administrative control and tighten the lease and levy penalties. However, these measures to lower implementation failures are later found to be faulty as they do not address the real cause of most failed federal programs. The policies have often failed to achieve their objectives because the implementers often do not follow directions, nor do they always act to maximize policy objectives. Often the people responsible for the implementation behave in a frustrating and unpredictable manner (Pressman & Wildavsky, 1984).

Moreover, many factors affect policy implementation such as population size, intra-organizational relations, commitments, capacity, and institutional complexity. One of the conclusions of policy implementation analysis is that the implementers do not identify the mandate that matters (McLaughlin, 1987). In addition, the motivation and commitment reflect on the implementer’s assessment of the value of policy and the strategy. Often while translating the policies to a reality, the implementers set vague goals and use few resources. Another conclusion of the policy analysts’ is that the outcome can often be improved by a combination of pressure and support from policy designers (McLaughlin, 1987).

Implementation often occurs in fluid settings, i.e. every implementation action changes the policy problems, policy resources, and the objectives. New requirements, issues, and considerations emerge as the policy starts to be translated into action. To keep the implementation

as close to the program objective as possible, the planners must have clear goals, precise statutes, control on the course of the policy, and effective authority (Sabatier & Mazmanian, 1980).

Implementation then becomes a process of bargain and negotiation. Knowledge generated by analysis and evaluation of the policy comes into play when the policy is reformed.

Due to the inherently contested, contingent and unpredictable course of policy implementation as outlined in the previous section, evaluation becomes all the more important, both from the point of view of supplying any mid-course corrections to ongoing programs, and to provide design inputs for future policies and programs.

Implementation is an important aspect of the policy process, and learning about the factors that influence and the problems that affect successful implementation of a policy helps in designing better structured policies that ensure achievements of their goals. Implementation evaluation research provides “advice to policy makers as to how to structure programs to increase the likelihood of implementation success” (Birkland, 2010, p. 264). Policy theorists discuss “top-down” or “bottom up” approaches as a means to study policy structures to increase success of a policy (Birkland, 2010; Sabatier, 1986; Sanderson, 2000). Policy evaluation is not only important in cases of policies that have failed to achieve its objectives, but also in case of successful policies as the study of both successful and failed policies add to the knowledge of policy making (Birkland, 2010, p. 272).

There are several methods of policy evaluation, just as there are several methods of policy implementation. Some methods deconstruct the “explicit or implicit ideology” behind the policy, and select a few elements of the policy as the “embodiment” of the policy (Grin and Vaillancourt, 1999, p. 2). This evaluation method is based on an attempt to interpret the policy and reveal their aims and goals. Other studies employ evaluation methods with a more narrow focus of evaluation. For example, one evaluation research study the “sociolinguistic or demolinguistic variable” – percentage of a particular language speaking population in an age

bracket in a specific demographics – to understand how a policy has affected this change (Grin and Vaillancourt, 1999, p. 3).

Policy evaluation assesses the implementation of a program or policy periodically, in light of the program objectives, in order to make mid-course corrections or to obtain useful knowledge that can guide the design of future programs and policies. It comprises more than just gathering information about a policy, but is a “systematic attempt to gather information in order to make judgments and decisions” (Lynch, 1996, p. 2). Information for evaluation can be both qualitative and quantitative, and can be gathered by several methods such as interviews, observation, and pencil and paper tests. Program evaluation method varies with the nature of the program or policy, the perspective of the researcher about the subject of the policy, the kind of information being sought, and the uses that the information would be put to.

Depending on which aspect the researcher focuses on, policy evaluation might also be classified into three: first, process evaluation “monitoring and controlling to determine whether program design and implementation correspond to policy goals” (Schmidt, Reilly & Schomann, 1996, p. 198); impact evaluation – which considers the outcome variables resulting from implementation; and third, a mix of process and impact evaluation. For insightful evaluation research, the methodology should include “systematic application of social research procedures for assessing the conceptualization, design, implementation and utility of social intervention programs” (Rossi and Freeman, 1985, p.19). The section below provides an outline of the theoretical and methodological approaches used for policy evaluation most often in the policy literature.

Theories and methodologies of program evaluation

Evaluation methodologies are used by program analysts to measure the extent to which the programs have been successful in achieving their goals. There are four main evaluation methodologies – post-positivism, pragmatism, interpretivism, and critical normative science (Noblit & Eaker, 1988).

Post positivism, the dominant tradition in the history of program evaluation, is designed to evaluate macro policy issues of program effectiveness and cost efficiency. In this methodology, primary importance is given to the issue of social accountability in the outcomes of a program. This methodology makes use of ideological frameworks of systems theory, and judges efficiency, accountability, and theoretical causal knowledge. The methodology generally uses quantitative methods and quasi experiments. It evaluates whether desired outcomes were achieved, and whether and to what extent these outcomes are attributable to the program or to random chance. Moreover, post positivism seeks to determine if the program or policy is the best alternative for the desired results (Greene, 2007). In post positivism, a researcher uses several methods to capture as much of the reality as the researcher can. It emphasizes on the “discovery and verification of theory” (Denzin & Lincoln, 2005, p.11). Traditional measures such as internal and external validity and structured analysis - sometimes even including statistical data - are given importance in this methodology. The methodology also includes frequency counts, tabulations, and simple statistical analysis. It is used to isolate causes and effects; operationalize theoretical relations; measure and quantify phenomena; and establish generalizations from the data collected (Flick, 2002, p.3).

The second method for program evaluation, pragmatism, mainly arose from the need to provide information for program decisions. Pragmatism is a link between “theory and praxis” (Denzin & Lincoln, 2005, p. 53). The method includes both the subjects and objects of inquiry

and the actions are “purposeful and aim at creating desired outcomes” (Denzin & Lincoln, 2005, p. 53). Unlike post-positivist scholars, who conduct cognition-based research, researchers using the pragmatist methodology use scientific methods to generate knowledge through action and experimentation. The information is gathered for their practical and pragmatic value, and the method addresses a practical problem rather than make use of a philosophical tenet. This methodology can use either quantitative or qualitative methods, or a combination of both to judge management programs and their utility, quality and practicality (Greene, 2007). While post-positivism is a method that is targeted at high level policy and decision making, pragmatism is targeted at mid-level program managers, and administrators. The method makes use of surveys, questionnaires, interviews, and observations. It is targeted at fathoming the sections of the program and policy that are yielding results, and the effectiveness of the program as compared to its goals and the needs of its target beneficiaries.

The third method of evaluation is interpretivism. This method takes its framework from the interpretive philosophy of science. It makes use of qualitative approaches and seeks to increase program understanding for the stakeholders and increase the values of pluralism and aim at program improvements. This method uses interviews, case studies, observations, document reviews to promote understanding, diversity, and solidarity. The method examines how a program or policy is affecting various stakeholders and is targeted at program directors, staffs and various other beneficiaries. Researchers using the interpretivist method of evaluation view subjectivity not as a bias but as a part of the research process, which is used “actively and creatively” in the research (Cohen & Crabtree, 2008, p.333). To ensure reliability and validity, interpretive researchers are responsible for reporting information “data excerpts and information about the interpretive process” (Cohen & Crabtree, 2008, 334) so the readers can verify the data, interpretation process and the analysis, and identify the patterns for themselves. The center theme to the interpretivist approach of evaluation is that “realities are multiple, fluid, and co-constructed,

and knowledge is taken to be negotiated between the observer and participants” (Cohen & Crabtree, 2008, p. 335) and hence, this approach values subjective meanings and works on the assumption that there are multiple ways of witnessing and experiencing a phenomenon.

The final approach to program evaluation is critical normative science that addresses ideas of emancipation, empowerment and social change. It makes use of methods, where stakeholders participate in various qualitative and quantitative designs and methods such as historical analysis and social criticism. The method aims at studying the ways in which premises, goals and the activities of the program maintain the inequities of the society. This method addresses the program beneficiaries, their communities and other powerless groups. It seeks to expose the historical, structural, and the value bases of a social phenomenon and to bring on social change and discussions on ideas of equity, justice and democracy.

With the above review of the literature on policy implementation and evaluation, we now turn to existing scholarly analyses of social policy implementation and evaluation in media regulation, as part of which the existing literature on LPFM is also reviewed.

Social policies in media regulation

Media policies such as the LPFM initiative are social policies that govern the field of mass media and how information is diffused and distributed among the public. They are created by the interaction between “the pursuits of national interest by states and the operations of commercial/industrial enterprises” (Cuilenberg & Mcquail, 2003, p. 182). They are projects with a fixed set of objectives to be achieved by a fixed time schedule.

Media theorists have advocated two normative approaches on the distribution of information through mass media: the “dominance” and the “pluralist” perspectives (Mcquail, 2005 ; Humpherys, 1996). The “dominance” perspective argues that media organizations are

“likely owned or controlled by a small number of powerful interests and to be similar in type and purpose” (McQuail, 2005, p. 87). The “dominance” perspective discusses how “media power resides in the control of a dominant elite and ruling class...ownership and control of the media organizations is highly centralized and concentrated in the hands of a relatively small number of very powerful interests” (Humpherys, 1996, p. 4). The media presents a selective view of the world, decided “from above”.

The “pluralist approach” is the opposite of the “dominance” perspective and discusses that the media power is constrained within a social and institutional framework which is not dominated by a unified elite. Control of the media power is open to “competing political, social and cultural interests and groups” (Humpherys, 1996, p. 4). It is seen as a cultural good. It explains that there are no dominant or unified elite and that “change and democratic control are both possible” (McQuail, 2005, p. 87).

The field of media has witnessed important changes, especially because of the technological developments in this industry and the “increased importance that media has achieved in the post-industrial society” (Cuilenberg & Mcquail, 2003, p. 182). The progress of media policy has been divided into three stages – emerging communication industry policy phase; public service media policy phase; and new communication policy phase (Cuilenberg & Mcquail, 2003, p. 183). The policies in the field of communication are divided into two categories – media policy that is targeted toward political welfare goals and telecommunication policies that pay more attention to market conditions, infrastructure and regulation of monopoly. The success of the policies directed at various objectives such as welfare goals are largely dependent on the manner in which they are implemented. Hence to understand the policies and their achievements, their implementation process would need to be closely examined.

Media policy evaluation literature

Compared to economic policies, where evaluation can be more easily based on quantifiable measures, social policies are hard to evaluate because both the inputs and outcomes are often intangible. This is especially so for media policies, where evaluation might have to account for the significance of the goals, quality and effectiveness of the programs. These programs are proposed, defined, debated, enacted and funded through political processes, and therefore the evaluation of their outcomes too are often subject to political pressures. Often there are competing and potential stakeholders, who have an interest in either the success or failure of the program, who may try to influence the evaluation process. Despite these potential difficulties, the evaluation of media policies, in terms of their successes and failures to achieve stated program goals, has been researched by several scholars (Doyle 2000; Grin & Vaillancourt, 1999; Jordan, 2008; Pickard, 2011; Awad & Roth, 2011). Some scholars have studied the cost effectiveness of policies, for e.g. research on minority language policies discovered that “it is possible to assess the output and costs of various language policies in such a way as to allow an explicit evaluation and ranking in term of effectiveness and cost effectiveness” (Grin & Vaillancourt, 1999, p.103). The study, undertaken to analyze the cost effectiveness of various language policies, designed a methodology to comparatively evaluate the costs of various options and quantify the benefits from each in order to select the most effective language policy among the various options. In addition, the study discussed minority language policies that have focused on the targets chosen for such policies, inquiring on targets of previous language policies (Grin & Vaillancourt, 1999).

Another expert critically appraised the FCC policy embodied in the “Blue Book” - released in the 1940s as a method to counteract rampant racism – in its historical context. The study discussed the history of the Blue Book since its inception and shed “light on the normative debates, political strategies and historical context to address omissions in existing accounts”

(Pickard, 2011, p.173). Many of the issues that were addressed in the Blue Book are still being discussed such as “commercialism, undue influence from advertisers, overly sensationalistic fare, lack of minority representation, negative effects of media concentration”. The study examined the archival materials such as letters and policy memos to discuss these reforms and concluded that there should be a more critical appraisal of US media system to understand the politics of policy and how media serves the “democratic society and governance” (Pickard, 2011, p.187). The study added that media reforms that were brought about in 1940s had been largely ignored by scholars although they added to the knowledge of alternatives to a commercial media system.

Increasing diversity of opinion in the public sphere has been a much debated issue in the policies of other countries as well as the US. Scholars have evaluated Dutch media policy on cultural diversity, that has changed from support for the small and minority community into “cross-cultural media targeted at multiple (and in many cases, all) social groups” (Awad & Roth, 2011, p. 400). In the study, the scholars concluded that the biggest challenge faced by Western Europe is the “increasing heterogeneity of their audiences and the ever more pressing forces of media competition” (Awad & Roth, 2011, p. 412). These issues influenced the Netherlands to change their minority policy to encourage cross-cultural programs since 1990s. As the programs are in Dutch and address multiple social groups, the government argued that programs have broadened their target audience – while including children of immigrants as well. The study also hinted at how politics have influenced the “country’s official shift from multiculturalism to integration” (Awad & Roth, 2011, p. 413). Finally, the research raised questions about the interaction of politics, economic and demographic factors, and brought forth the issue of how minority policies and policies of assimilation “relate to each other”.

Evaluation methodologies have been used by scholars to study media policies in various fields like children’s programming (Jordan, 2008), ownership policies (Doyle 2000), broadcast media policies (Flew, 2006), impact of the Internet on evaluation of policies (Bozeman, 2004).

These studies reveal how the best designed policies have failed to achieve their goals because they did not anticipate the problems that the targeted beneficiaries face once the policy is implemented. Moreover, these studies have revealed that vested interests affect both the formulation and implementation of policies.

The study on children's programming policies revealed that although policies might make all the arrangements to fulfill their goals, they can misjudge how the targeted community interpret and understand their directions (Jordan, 2008). For example, the television industry obeyed the rules and regulations set by the government flawlessly by providing ratings for every television show, including v-chips in the television set, and airing three hours of educational programs for children every week. However, analyses of broadcast content demonstrated that programmers still failed to shield the children from undesirable content and increase their exposure to "good" television. The reason these policies did not work was because "media companies live up to the letter but not the spirit of the law" (Jordan, 2008, p. 244). The study found that the parents forgot to use the V-chip device, while others even found the device difficult to locate: "only 11 per cent of the parents know that FV is an indicator of violent content in children's programming" (Jordan, 2008, p. 244). The three hour rule was not successful because few parents knew that educational programs were being aired during that time slot. Moreover, some parents even disagreed that the supposedly "educational" programs were very educational. The study argued that broadcasters had dubious parameters for labeling a program as educational.

Contradictory policy goals affect successful implementation of policies as well; for example, media deregulation relaxes standards of merger review and defeats the government's broader objectives of diversity. Doyle (2000), in a study of UK media ownership, discussed how the Communications Act of 2003, which allows further deregulation was obstructing the promotion of plurality of different voices. Although the British government has shown a renewed

interest in public service broadcasting, universal access, quality and diversity, these goals have been set back because “concentrated ownership of the main instruments of mass communication is undeniably a dangerous and undesirable state of affairs” (Doyle, 2000, p. 722). Increasing concentration of media ownership has raised the possibility that some political and cultural views are over-represented to the detriment of media diversity. Another study, of the Australian media system, also highlighted this potential contradiction between policy goals, and its impact on results. Deregulatory initiatives motivated by a neoliberal agenda had the unfortunate effect of limiting the “participatory scope of public interest and civic society organizations” (Flew, 2006, p. 297) in promoting the assured “profitability for incumbents” (Flew, 2006, p. 297).

Policy implementation research on the FCC’s diversity policies

The Federal Communication Commission (FCC) has made several attempts in designing media policies to cater to the needs of all the communities in the country. Since publication of the 1946 report, *Public Service Responsibility of Broadcasting Licensees*, the FCC has consistently made efforts to accommodate the media needs of all ethnic, racial and social minorities. Experts have since evaluated the FCC’s attempts to address the needs of minority and local communities (Baynes, 2000; Horwitz, 2004; Weissman, 1981).

Weissman (1981) conducted an early evaluation of various minority policies formulated by the FCC to study how they have fared in encouraging diversity in the community. Weissman researched several of the FCC’s diversity-oriented policies, such as the Ascertainment Program requiring commercial broadcasters to undertake a thorough review of local community needs and problems in order to guide their programming choices; the Fairness Doctrine, requiring stations to cover all controversial issues of public importance within the local community, and to present all

sides of controversial issues; Equal Employment Programs that is focused on providing more job opportunities for underrepresented groups; and Minority Ownership initiatives , all attempts to include minority voices in the media. In 1978, FCC made changes in its ownership policies – such as comparative hearing, distress sale, and tax certificate policies – to encourage members of minority communities to own their own broadcasting stations (Baynes, 2000).

Weissman's (1981) study revealed that most of these minority policies have loopholes that reduce their effectiveness. In the case of the Ascertainment Program, Weissman argued that the policy does not “clearly articulate what constitutes programming “responsive to” problems and needs of the community” (p. 562). In case of the Equal Employment and Minority Ownership programs, the study argued that it is unclear whether increase in employment of or ownership by members of minority community will help in increasing minority programming. Moreover, the study said that there were “procedural and conceptual obstacles to the attainment of this goal” (Weissman, 1981, p. 562). Procedural obstacles include the fact that evidence to prove discrimination is difficult to find. Similarly, FCC does not take into account that minority employees may not be in a position to influence programming. Minority ownership initiative has similar problems as well since there is no guarantee that this policy will actually increase minority ownership. Moreover, minority ownership can be economically feasible only if the broadcast station has adequate transmitter power and range, and if there is a significant minority population in the local market. The study concluded that all the FCC minority media policies have loopholes which “undermine attainment of responsive minority programming” (Weissman, 1981, p. 562). In addition, minority employment and ownership policies do not help non-recognized and non-organized minorities. Similarly, another study discussed how the definition of diversity by the FCC is “problematic and under-theorized” (Horwitz, 2004, p. 1). Earlier, FCC's ceilings on the number of broadcast outlets that can be owned by a corporation or an individual and cross ownership rules supported their diversity goals. However, in the past two

decades the change in ownership policies have led to concentration of media in few hands that has in turn “undermined the diversity rationale” (Horwitz, 2004, p. 1).

These evaluations have revealed that these FCC policies—although approaching the diversity goal in different ways—develop loopholes that stop them from being effective. As discussed earlier, policy evaluation is an important stage of successful policy implementation because it assists in understanding how a policy is faring in achieving its objectives and “provide information as to how programs should be adjusted to make them more efficient” (Schmidt, Reilly & Schomann, 1996, p. 198).

Prior literature on LPFM

The FCC’s latest step to introduce localism and diversity in the public sphere has been the Low Power FM (LPFM) radio initiative that was launched in 2000. The FCC Report and Order of January 20, 2000 creating LPFM authorized the formation of two new classes of Low Power Frequency Modulation stations, LP10 – with power from 1-10 watts and a service radius of about one to two miles, and LP100 – with power 50-100 watts and a service radius of about 3.5 miles (FCC, 2000b).

The LPFM initiative has attracted significant scholarly debate and interest from before its inception, which has continued into the implementation phase as well. During the years following its initiation by the FCC in 2000, it has engaged various scholars, who have explored its implementation and examined its performance in encouraging local, marginalized and minority voices (Connolly-Ahern et. Al, 2012; Conti, 2010; Connolly-Ahern et. al, 2009; Cano, 2006; Goetz, 2006; Robb, 2009; Lucas, 2006; Hamilton, 2004; Powell, 2001). These opinions have

ranged from the highly supportive to the critical, with many agreeing with the program's goals, while critiquing the implementation.

Among those who have been highly supportive of the policy, experts have looked at LPFMs - and other recent debates on ownership rules - as a positive move toward media reforms that would bring in social justice (McChesney, 2004; Johnson & Menichelli, 2007; Greene, 2008). The LPFM received huge support from the pro-community radio groups, other media activists, and even wider broadcasting industry. Although LPFMs have been seen as mixed blessing by scholars, activists, and its various stake holders, some have shown distinct faith in this service to provide "thousands more communities will one day be empowered by this new radio service" (Cano, 2003, p. 275). They have argued that LPFMs not only provide an alternative to commercial broadcasting, it also teaches the media activists a crucial lesson that "organizing around tangible reform proposals could actually generate popular support and sustained attention in Capitol Hill" (McChesney, 2004, p. 258), since for the first time "organized people were challenging organized money on media policy issues" (McChesney, 2004, p. 258).

LPFMs have also been looked at as the latest and most positive step toward community radio that is a "better example of community empowerment in grassroots" (Johnson & Menichelli, 2007, p. 6). Giving example of a community radio in Florida, WCIW-LP, one expert explains how this radio station produces news, educational programs, music in Spanish, Haitian Creole, and indigenous languages of Mexico, and Guatemala. It argues that LPFMs provide the right frame for small communities that are different from the majority community in more ways than one such as language, culture, social and economic status, and political leanings. The station has become the "primary organizing tool for the community in its defense of the rights of Latino, Haitian, and Mayan Indian migrant and immigrant farm workers" (Johnson & Menichelli, 2007, p. 6).

Moreover, it has been argued that the LPFMs can play a much more important role than just providing information and entertainment to its community (Greene, 2008). They can also be used in times of disaster, because in the time of extreme need for information, the low power FM radio that is rooted in a local community, would serve the requirement for specific information and articulating the community's needs the best. Giving the example of New Orleans in the aftermath of the Hurricane Katrina, an expert recalled how the city had petitioned for and received an LPFM that was then used at the locations where evacuees were housed. "Emergency announcements as well as simple logistics information needed to reconnect families were broadcast" (Greene, 2008, p. 23).

In consideration of these benefits, scholars have defined the growth of LPFMs and the attention it has garnered in first five years as exponential (Smallwood & Newton, 2006). They said that the LPFMs have succeeded in adopting the "rhetoric of diversity and localism seeking to fill their defined nonprofit roles" (p. 22) and has avoided the pitfalls of "law of unintended consequences or are not quickly co-opted by existing powers" (Smallwood & Newton, 2006, p. 22). Further, they commend FCC for being successful in "crafting rules that will develop a service committed to non-profit ideas" (p.22).

In contrast to these highly supportive opinions, some scholars have been very critical of the program with some questioning the very rationale and need for an LPFM policy. For example, questions were raised on the non-commercial aspect of the service by the then FCC Chairman Michael Powell, who pointed out that "if you are truly committed to serving the public interest, bet on a winner and bet on market [oriented] policy" (Powell, 2001, p. 2). Others too have questioned the idea of LPFMs as an alternative to the commercial broadcasting since the "original proposal (restrictive as it is), has been diluted further through the legislative process (itself subject to significant pressures from radio broadcasting industry), serving ultimately to continue the rationalization of the radio industry" (Hamilton, 2004, p. 56). It has been felt that the policy that

was meant to increase diversity and local control has just done the opposite “by enforcing a standardized format and operation that bears little resemblance to micro radio activists’ hopes for a legal means of community communication” (Hamilton, 2004, p. 56). Another critic called the then-chairman of the FCC, William Kennard, a “cultural technician” and pointed out that although the “public will behind LPFM represented by the coalition of free speech advocates, churches, and radio enthusiasts, may have been the bulwark that kept LPFM from washing out completely, but it was not enough to counteract the slow narrowing of the scope of LPFM” (Lucas, 2006, p. 63). He pointed out that by making the service non-commercial, the FCC effectively “cut off a key constituency that had supported LPFM, lost a valuable rhetorical bludgeon for the public debate, and arguably removed a valuable source of innovation, initiative, and funding” (Lucas, 2006, p. 63).

The relevance of LPFMs have been questioned as well, with an expert arguing that the agenda of FCC is not big enough to justify it creating problems for an existing broadcasting system, and suggesting that “the FCC should explore new technologies to enable expression, not hamper technological development by promoting old technologies” (File, 2000, p. 29). He further suggested that the Internet – if not now, in the near future – could be a perfect solution to promote diversity and localism. Another critic accused the Congress of levying higher technical requirement that eliminated 80 per cent “frequencies for LPFM stations across the country” (Brinson, 2002, p. 66).

However, most reviews of LPFM policy have fallen in between these two extremes, being generally supportive of the policy while finding fault with implementation. Adopting a critical tone, Cano (2003) argues that stations failed to meet the needs of the “recently arrived immigrant groups, inner city youths, senior citizens, migrant farm workers, and people in mountain and rural community” (p. 265). However, she did show faith in this service and said that many underrepresented groups will “one day be empowered by this new radio service”

(Cano, 2006, p. 265). One expert found that the low power broadcasters that were running illegally before the sanction of the LPFM service were much more experimental about their content and had a “much less rigid and much more fluid approach to programming and station operation;” now the LPFM service is considered as the “farm league for the development of radio professionals, particularly racial minorities” (Hamilton, 2004, p. 54).

Similarly, Robb (2009) agreed that community radio is good alternative to commercial broadcasting, provided the challenges of the community radio set up can be removed. Ideally, community radio is expected to provide a platform to the voiceless community and functions both as an electronic space for airing relevant programming, as well as a “concrete” physical place to gather and exchange information. When managed well, the community radio or in this case LPFMs could be used as “living representations of their local communities” (p. 113) provided the challenges – such as managerial burn out, the intrusion of personal agendas, the loss of community focus, absence of professionalism, interpersonal disputes, ideological differences, lack of funding, and internal conflicts – can be eliminated.

Some experts have expressed concern on the identities of some of the organizations that have made use of the service to capture and serve a community (Lucas, 2006; Connolly-Ahern et. al, 2008; Goetz, 2006) and questioned why some sections of society such as religious groups have a greater percentage of LPFMs than the others, contrary to the earlier goals for which LPFMs were started.

Questions have been raised on the role the LPFM stations play in the lives of the community they serve and what kind of community service these LPFMs perform (Connolly-Ahern, Schejter, & Obar, 2012; Connolly-Ahern, Schejter, Obar, & Martinez-Carrillo, 2009, Wikle & Comer, 2009; Conti, 2010). Some of these religious stations claim to be a part of the local charities. However these LPFMs follow a strong programming codes from which they are reluctant to deviate even on specific requests - from the member of the local community; one

president of religious LPFM station observed about contributions from the community saying that “at the very beginning I did have some people that wanted to have things on the air that wasn’t Bible-backed ... I only want things that you can say that’s in the Bible” (Connolly-Ahern et.al., 2009, p. 21).

These experts, through the study, discovered that the missions of some of the LPFMs are not in congruence with the FCC’s goals for wanting to establish the LPFM service. They conclude that although the “low power FM can potentially provide the FCC envisioned local service, however the current policy design allows for the proliferation of stations that clearly do not provide a local service according to FCC definitions” (Connolly-Ahern et.al., 2009, p. 25) and furthermore, the LPFMs are not working according to their own mission statements as well and they are more committed to the goals of the national network they are part of, rather than the geographical community they belong to. Hence, some of the LPFM stations are silencing the very voice that they were supposed to promote.

A subsequent study by the same scholars, which took interviews of operators and employees of general interest and religious LPFMs, argued that the “hands off deregulatory approach that has characterized the FCCs in the 2000s led to a policy implementation design that applied for an outright abuse of policy goals” (Connolly-Ahern, Schejter & Obar, 2012, p. 39). It said that there is proliferations of LPFMs, mostly religious, with non-local content that do not identify themselves with their geographical locality, “they do not seek community input”, and they “see their role as connecting their locality to their national or international organization” (Connolly-Ahern et.al., 2012, p. 39).

The study concluded that unless non-profit organizations such as churches have a local presence and a local mission “they do not qualify as a desirable licensee” especially since FCC frowns upon “retransmission of programming whose source is external” (p. 40). The study also

said that FCC needs to redesign the policy and “loopholes needs to be closed because they can lead to abuse of the policy and to the silencing of local voices” (p. 41).

This dissertation is not intended to be a critique of the LPFM policy itself or any aspect of the LPFM policy. It does not discuss the limitation that the LPFM policy imposed on itself through its various reformulations and changes, and it does not raise the question of whether a commercial or a noncommercial format would have suited better to achieve policy objectives of localism and diversity. Instead, this dissertation, arguing from an interpretivist framework, posits that the manner in which different stakeholders interpret and implement policies framed by the policy designer have a major impact on the outcome. This is especially true of social policies, where the outcomes can be especially difficult to quantify and analyze. Among the numerous articles to address the LPFM issue since its initiation in 2000, few have addressed the question of how a critical stakeholder group—namely the owners, managers, and DJs of the LPFMs themselves—have interpreted the goals and objectives of the LPFM radio station policy, as enunciated by the FCC. Connolly et al. (2012) come closest to this objective, but their focus is on religious broadcasters whereas this dissertation seeks to study minority-oriented LPFMs, that arguably have a greater impact on the realization of the FCC’s diversity goals. This study intends to address this gap and focus on these stakeholders that interpret the policy on a daily basis to address the issues of diversity and localism and achieve the goals set by the Commission. It would explore how the licensees interpret diversity and giving voice to the “voiceless”, and what is their definition of “needs of the community” and the measures they take to fulfill it.

Chapter 3

History and Outline of LPFM Policies

With an estimated annual revenue of \$17.7 billion dollars in 2012, the U.S. radio broadcasting industry has established itself as one of the mainstays of Americans' media consumption pattern (Standard & Poor's, 2012). There were a total 11,327 commercial radio stations in the U.S., including 4,762 AM stations, 6,555 FM stations, and an additional 3,712 non-commercial educational FM stations. Despite competition from other media as well as satellite radio, and portable devices, the Radio Advertising Bureau estimated that 93% of Americans aged 12 years or older listened to radio every week (Standard & Poor's, 2012). According to the RAB, 60.4% of adults listened to radio in their cars, 17.8% at home, and 10.4% at work or another location on weekdays. Around 99 per cent of US households have radio sets, the highest penetration rate for any media technology (Lashua, 2004). Though growth rates have slowed down in recent years, the U.S. radio broadcasting industry remains a highly competitive market.

Despite these signs of health, commentators have pointed to several problems with the U.S. radio industry (Wikle & Comer, 2009; Miller, 2004). First, the level of industry concentration has been increasing especially after the 1996 Telecommunications Act, with one company, Clear Channel, alone controlling 866 stations spread over 150 markets (Standard & Poor's, 2012). Increasing concentration has reduced competition in local markets, and affected the distribution of local news and information, and limited the diversity of perspectives that radio audiences are exposed to (Wikle & Comer, 2009; Miller, 2004). Industry consolidation also had the effect of increasing station prices, further reducing the percentage of minority ownership (Miller, 2004).

The initiation of the LPFM program was intended to address these problems. At the time of its formulation, the LPFMs were expected to "open the doors of opportunity to the smaller,

community-oriented broadcaster, and will give hundreds—if not thousands—of new voices access to the nation’s airwaves” (FCC, 2000d, p.1). However, there were many changes made in the initial design of the policy during the formulation process that also changed the initial objective of the LPFM initiative. Even though, the character of LPFM policies has changed substantially from its initial design, the LPFMs still retain the potential to serve as media outlets to the under-served. It is therefore important to measure the performance of the LPFM program and the manner in which it has given voice to the “voiceless.”

Origins of LPFM

Commercial broadcasting in radio industry began in 1919 and radio broadcasting soon emerged in five different forms: state broadcasters (pertaining to government funded and operated programming), public services (state owned, non-commercial broadcasting corporations operated autonomously of government), commercial operations (for-profit private networks), community broadcasters (legal low power radio stations operated by community organizations) and underground (illegal and unauthorized broadcasting) (Lucas, 2006). In the United States, a commercial broadcasting sector soon emerged, along with unauthorized underground broadcasters. Spectrum interference from these unauthorized broadcasters led to a crackdown on them after the passage of the 1927 Radio Act.

Cancellation of Class D Service: Low power FM stations have followed a long tradition of efforts made by various activist groups such as “amateur radio of 20th century, public sector and educational broadcasting, labor radio, underground press of 1960’s, public access television, guerrilla videos, the Internet, pirate radio and micro radio” (Hamilton, 2004). In one way or another, low power radio stations have existed since 1948 (Lucas, 2006). They were under the

Class D services, started by the FCC to facilitate broadcasting by schools and universities. The idea of LPFMs as a mass movement began in the 1960s when thousands of low powered radio stations emerged all over United States. Many of these radio stations were associated with community groups and most of them were illegal. At the same time, the Class D service's contribution to the public interest and interference with commercial broadcasting was being questioned.

To curb the illegal operations of the radio stations, the FCC stopped the Class D services as it was engaging the spectrum that could be used by public radio to serve public interest more effectively (Lashua, 2006). This move, however, offended various communities, operators and activist groups. Although the small organizations were stopped from taking advantage of the spectrum, the FCC kept issuing low powered transmitter licenses to large commercial networks to access remote areas. This discontent with government policy led to many communities and activist group starting unlicensed radio stations in 1980s. Some of these stations belonged to minority groups such as Zoom Black Magic Radio, and Black Liberation Radio.

In 1993, Stephen Dunifer started a pirate radio station, Free Radio Berkeley. He argued that "airwaves were public domain and were protected by the First Amendment" (Lashua, 2006, p.2). Dunifer used this station to broadcast news and information. Radio Free Berkley soon "evolved from a one person crusade into a community-wide effort that operated in open defiance of FCC restrictions against unlicensed broadcasting" (Howley, 2000, p.261). This pirate radio station was the subject of highly public legal battles between Dunifer and the FCC. It attracted public interest law firms and free speech advocacy groups such as the Center for Democratic Communication (CDC) that came to Dunifer's aid.

For three years, Dunifer, the CDC and FCC were involved in a series of hearing that resulted into Free Radio Berkley gaining legal status. In 1995, a federal court handed down an unprecedented decision that rejected the FCC's request to force Free Radio Berkeley off the air,

ordering the FCC to respond to the constitutional issues Dunifer had raised in his appeal (Lucas, 2006). Dunifer argued that FCC had not made an effort to ensure that “disenfranchised groups had means of accessing the airwaves” (Lucas, 2006, p. 54). He further argued that freezing the Class D services was “discriminatory as the groups most affected by the ban were minorities and other disenfranchised groups” (Lucas, 2006, p. 54). This court case encouraged other micro-broadcasters in the country and raised questions about the “legality of privileging high-power commercial and noncommercial broadcasters over low-power community radio” (Lucas, 2006, p. 54).

Although by 1998, the court decision was reversed and Free Berkely Radio was shut down, “rather than undermine their efforts, the FCC’s legal victory and aggressive tactics galvanized the microradio movement” (Howley, 2000, p.262). The “micro radio movement” gained further momentum when the Telecommunications Act 1996 led to massive consolidation in radio industry, which further confirmed illegal broadcasters’ fears that FCC was sympathetic to large media conglomerates and their trade associations (Lucas, 2006).

Telecommunication Act 1996: The Telecommunication Act of 1996 was another factor that influenced the policy on Low Power FM stations. The deregulatory initiative in the 1996 Act resulted in unprecedented consolidation in the radio industry in the hands of few large corporate networks. The policy alterations in the 1996 Act created incentives for large media firms to merge with competitors and acquire smaller firms in order to benefit from scale economies and operational efficiencies. However, this increased the concentration of content providers and delivery systems among fewer entities. Several scholars questioned the negative effects of these rules on competition in media markets. They argued that this consolidation further reduced the amount of local news and information delivered over commercial media. (Wikle & Comer, 2009; Miller, 2004). As a consequence, media critics and consumer groups began to express increased interest in the promotion of local alternatives to the corporatized mainstream media (Anderson,

2001). The Telecommunication Act of 1996 and the subsequent changes in ownership rules, such as in 2002 Biennial Review Order, and a growing unrest among media critics and consumer groups led to re-assessment of media ownership rules by FCC. In an attempt to understand the influence of ownership rules on Commission's goals of localism, diversity, and competition, the FCC held a series of public hearings in 2006 that invited the public and media experts to discuss media ownership rules and their effect on local programming and minority ownership.

Biennial Review Order (2002), LTF and Media Ownership Hearing (2006): In 2002 *Biennial Review Order*, the Commission replaced the existing “newspaper/broadcast cross-ownership rule nor the radio/television cross-ownership rule” (FCC, 2006a, p.3) with new cross-ownership regulations called the Cross Media Limits (CML). It also revised its “market definition”, method of counting stations “for purposes of the local radio ownership rule, revised the local television multiple ownership rule, modified the national television ownership cap, and retained the dual network rule” (FCC, 2006a, p. 3). In the same document, FCC reiterated that it would continue to focus on the long standing goals of competition, diversity and localism, and invited comments from the public on how necessary ownership rules are to “foster localism” (FCC, 2006a, p. 5).

In order to better judge whether the objective of increasing localism in the public platform is being addressed through its various policies, the FCC started a new initiative for localism in 2003. On August 20, 2003, the FCC launched a Localism Task Force (LTFs) to evaluate how broadcasters are serving their local communities (FCC, 2006b). The LTF was responsible for conducting “studies to determine the nature and extent of “local” service being provided by broadcasters” (p. 2) and “organize public hearings on broadcast localism around the country” (p. 2) and “make recommendations to the Commission on how the agency could best promote localism in radio and television” (p. 2) and “advise the Commission on how Congress might change the relevant laws to enhance localism” (FCC, 2006b, p. 2). The LTF was created to

understand “the effect of ownership structure on content” (Alexander & Brown, 2004, p. 1) and the “effect of ownership structure on the local focus of content” (Alexander & Brown, 2004, p. 2).

The Consumer Advisory Committee (CAC) issued in 2006 promoted the cause of localism and diversity by advising the Commission to adopt “rules that encourage local ownership of media outlets” (p.2) and “define the consumer interest obligations of broadcasters so that local communities know what to expect from licensees” (CAC, 2006, p.2) and similarly, it advised that the FCC “adopt rules to promote ownership opportunities for minorities, women, and people with disabilities before it considers other changes to its media ownership rules (CAC, 2006, p.2).

In November 2006, the FCC commissioned 10 peer reviewed studies as an ongoing effort to review its media ownership rules. The studies were in several topics such as consumer use of media; ownership structure and its effect on robustness of media or quantity and quality of programming; news operations; minority ownership; vertical integration; and ownership, format, and finance trends. The results of these studies shed light on how relaxed ownership regulations - imposed by the Telecommunications Act 1996 and subsequent changes in ownership rules – influenced the causes of diversity and localism were both positive and negative.

One scholar found that despite the relaxation of ownership rules, the “pace of consolidation” (Williams, 2007, P. 16) had slowed by 2006. Another scholar, who studied whether vertical integration lead to systematic discrimination against independent local content, concluded that networks don’t discriminate against fully independent programming, but programming from rival networks (Goolsbee, 2007). These scholars studying the effect of media consolidation television programming were positive about the consolidation. Three studies that examined the relaxed ownership rules and its influence on “local television markets” and local content discovered that a television station, whose parent company was a newspaper organization,

provides more local news programming (Crawford, 2007; Shiman, 2007; Milyo, 2007). One of the studies revealed that cross ownership of newspapers and television station has led to “more news programming per day” (Shiman, 2007, p. I-1). Similarly, a study on radio ownership structure on content diversity also revealed that “consolidation of radio ownership does not diminish the diversity of local format offering” (Chipty, 2007, p. 3).

Similarly, another study examining the effects of newspaper cross-ownership on local content and political news in local television found that newspaper cross-ownership is also significantly and positively associated with both local news coverage and local political news coverage (Milyo, 2007). The relaxation of media ownership rules, however, appeared to have affected the diversity in the market adversely. A study that explored the current state of minority ownership of media industries revealed that “minorities and females are clearly underrepresented in the three industries relative to their proportion of the U.S. population” (Beresteanu & Ellickson, 2007, p. 2-3). The study recommended that the FCC to make efforts “to ensure a full, consistent and accurate reporting of ownership status and its composition” (Beresteanu & Ellickson, 2007, p. 2-3). Similarly, another study discussed how the relaxation of FCC’s TV Duopoly Rule – that “prohibited the ownership of more than one television broadcast station in a market” (Hammond & O’Connor, 2006) - has affected the minority and women-owned broadcast stations. The study concluded that the “chief beneficiaries of the rule change were the top 25 group owners who as of 2005 accounted for 83 of the 109 (76%) duopolies identified” and there were no minority-owned or female-owned duopolies (Hammond & O’Connor, 2006, p. 54).

Following the media ownership hearings and the studies, the FCC took a step to relax the complete ban on newspaper and television cross ownership, but retained the “the radio/television cross-ownership rule” (FCC, 2008, p. 49) in order to protect diversity goals in the local market. Similarly, FCC retained restrictions on “common ownership of television stations in local

markets” (FCC, 2008, p. 51) in order to “protect competition for viewers”. The FCC also maintained the local radio ownership rule to maintain public interest (p. 60).

Concentration in the radio industry affected the minority community’s ownership stakes in the broadcast industry. A report by National Telecommunication and Information Administration (NTIA) in 2004 found that the Telecommunications Act of 1996 increased the television station prices and resulted in reduction in the percentage of minority ownership since the Act’s implementation (Miller, 2004).

Although deregulation generated healthy revenues in the radio industry, the consolidation led to elimination of smaller and less efficient media organizations and adversely affected the standards of discourse in society. The Telecommunications Act initiated a very strong collective backlash from the grass roots level and eventually led to what has been hailed as the “second rise of LPFM” (Anderson, 2001).

In 1998, under the influence of the unrest following the 1996 Telecommunication Act and consolidation of media ownership, the then FCC Chairman William Kennard announced that the agency would issue licenses for the low power FM stations to create opportunities for the minority community to participate in the public platform. In response to the FCC’s announcement, two different groups filed petitions for rule making. The supporters of LPFMs included public interest groups such as National Lawyers Guild, the Media Access Project, and religious groups such as United Church of Christ as well as small activist and outreach groups. One petitioner, Rodger Skinner, (Lucas, 2006, p. 54) requested for a 3,000 watt maximum transmitted power to allow the small entrepreneur to target and address a larger size of audience, while another group of non-commercial petitioners, Leggett et. al., (Lucas, 2006, p. 54) aimed at 1 watt and upward transmissions for promoting non-commercial usage for the FM stations.

Meanwhile, the National Association of Broadcaster (NAB) along with other corporate lobbying groups, such as the Consumer Electronics Association, opposed the service. They

protested that the LPFMs might overcrowd the spectrum and interfere with reception of millions of installed radios. Surprisingly, large religious organizations such as the National Religious Broadcasters opposed the LPFMs as well expressing concern over the effect of these stations on the broadcast of large religious groups.

In 1999, FCC issued the Notice of Proposed Rule Making and asked for comments on two classes of LPFMs – LP10, and LP1000. It proposed both commercial and non-commercial uses and allocation of the frequencies by lottery as well as auctions. The Notice also limited assignments to five licenses per owner. The two opposing sides had differed on the possibility of interference by the LPFMs to the already established stations. Both the FCC and the NAB sponsored studies to fathom the level of interference by active LPFM stations on the transmission of established radios, but none of the studies solved the issue conclusively. The Notice of Rulemaking received comments on the policy decision for a year. The LPFM policy discussed next was the outcome of this process.

LPFM policy

On January 20, 2000, the FCC adopted the Report and Order for the creation of Low Power Radio Service (FCC, 2000, p. 3). The Report and Order authorized the formation of two new classes of Low Power Frequency Modulation stations, LP10, with power from 1-10 watts and a service radius of about one to two miles, and LP100, with power from 50-100 watts and a service radius of about 3.5 miles (FCC, 2000b).

The LPFM stations are assigned on a non-commercial basis to entities that do not hold “attributable interest” in any other broadcast station or any other media that are subject to the FCC’s ownership rules. Initially only those entities that belonged to the communities the stations were meant to serve were allowed to participate in this service. The Report and Order described

the LPFMs as a class of service that was designed to serve the “very localized communities or underrepresented groups within the communities” (p.4) and was limited to noncommercial, educational, and public safety entities. The FCC also set a limit on the number of licenses a group or individual could own to one per owner. It also provided residential restrictions and stated that 75 per cent of the audience of LPFM station should live within the 10 miles of the station antenna.

The FCC expected the LP10 service to be highly useful for schools and local community organizations that wished to serve small areas and did not have the financial backing for constructing and operating a high-powered facility. Moreover, the FCC noted in the Report and Order that since the LPFM service was designed to not interfere with existing commercial FM broadcasting, the LP10 would better suit the “crowded urban areas where high-powered facilities are not likely to fit” (FCC, 2000b, p.6).

The LP100 service was considered beneficial because of its capability to provide “reasonable coverage area while remaining small enough to continue focusing on local needs” (FCC, 2000b, p. 6). The Report and Order explained that LPFM service was being sanctioned for “encouraging diverse voices in nation’s airwaves” (FCC, 2000b, p. 8) and “to allow local groups, including schools, churches and other community-based organizations, to provide programming responsive to local community needs and interests” (p. 9). And the LPFMs were designed to be noncommercial stations since commercial stations would be under pressure to maximize audience size in order to increase ratings and advertising revenues. The non-commercial nature, on the other hand, would be more likely to “serve small, local groups with particular shared needs and interests, such as linguistic and cultural minorities or groups with shared civic or educational interests” (FCC, 2000b, p. 9).

Criticism of the LPFM policy

Though the FCC's policy that emerged in 2000 was considered a desirable step forward by most observers, some expressed disappointment that lobbying by vested interests had succeeded in scaling back some of the most promising features of the initiative. For one, in contrast to the 1999 NPRM that had proposed both commercial and non-commercial LPFM stations, the 2000 Report and Order completely eliminated the possibility of commercial operation of LPFMs by ruling that licenses will only be issued to non-commercial organizations. The FCC also set a limit on the number of licenses a group or individual can own to one per owner. It also provided residential restrictions and stated that 75 per cent of the audience of LPFM station should live within the 10 miles of the station antenna. These restrictions severely limited the ability of LPFM stations to become financially viable by reducing the scale of their operations, and removing any possibility of advertising funding.

For several advocates of LPFMs, the difference between the original Notice of Proposed Rule Making and the eventual Report and Order ruined the potential of the low power stations to function as an alternative to commercial broadcasting. The most powerful LPFM service was of 100 watts that covered a range of 3 miles, while incumbent commercial stations' channel adjacencies were protected in a manner that significantly reduced the number of available frequencies. Commercial applications were forbidden, group ownership was also not allowed and residential requirements were kept in place.

The LPFM guidelines severely damaged the potential of the low level radio stations in areas such as cities where people could not get licenses due to the scarcity of available broadcast bands. Rodger Skinner found the regulations a disappointment as they completely closed the commercial aspect of LPFMs and argued that the decision was to facilitate the industry. Nonetheless, some news reporters (Janssen, 2000; Johnson, 2009) writing in outlets like the New

York Times looked upon the initiation of the new LPFM service as a defeat for the corporate lobbying forces such as the NAB (Lucas, 2006).

The guidelines did not give enough incentives to people to open LPFM stations. As a consequence, rather than the thousands of LPFMs that were expected to emerge in and around cities and would have potentially become financial, social and cultural resources for diverse audiences, just 1000 LPFM licenses were finally issued. Prohibiting advertising support meant that the stations would have a more limited audience than earlier hoped.

In December 2000, the Senate passed the Radio Broadcasting Preservation Act that did not abolish LPFMs, but changed the technological specifications to further limit the number of frequencies for the LPFMs. The most important change to the LPFM guidelines was that they were disallowed from medium and large cities as these areas did not have sufficient free spectrum under the new guidelines.

Implementation of the LPFM policy

Soon after the announcement of the Report and Order in 2000, questions were raised on the eligibility criteria for an LPFM licensee. The only guideline in the Report vaguely intimated that only non-commercial groups were eligible for LPFM license. Till 2006, the Commission had granted about 600 licenses for the LP10 and LP100 categories. Around 46 per cent of these applications were from schools and church communities with religious affiliations. Around 32 per cent were from various municipalities, state agencies, or schools, while 22 per cent were from community and citizen groups (Lucas, 2006). In 2003, a survey was conducted in which the LPFMs were divided into different categories according to their self-description. The survey discovered that 75 per cent of LPFM stations described themselves as stations airing music, 54 per cent provided news and information to its audience, 26 per cent defined themselves as an

educational station and 23 per cent described themselves as religious (Brand, 2004). Another study on a randomly selected sample of 131 LPFM stations revealed that around 37 per cent of the respondents belonged to religious organizations, while another 11 per cent were used by schools and universities each (Goetz, 2006). Only 63 per cent of the respondents were non-profit organizations that presumably aired local or minority content. Although successful in providing relevant content, around 64 per cent of the respondents did not provide employment opportunities for its community.

The possibility that stations could be run, based on community's feedback and contributions, was one of the major attractions of LPFMs stations and their goals of serving the local community. For most respondents, the Goetz (2006) study found that the community seemed to have an important role to play. Around 63 per cent tracked their audiences by informal communications, while 47 percent¹ respondents stated that they did not collect information about their audience. While over 59 per cent of the respondents collected feedbacks from its listeners. In another area, 69 per cent of the responding stations were not financially sound. Most of them complained that funding was the biggest barrier.

Around 65 per cent of the responding stations were airing music, another 45 per cent of the stations were religious (Goetz, 2006). Only 28 per cent of the respondents were airing current events, while 12 percent were airing special interest stories and only nine per cent of the responding stations broadcasted political content. This study revealed that the radio stations were trying to provide content that served the community with more than just entertainment; however, entertainment and religious programs far exceeded news and other interests. Around 81 per cent respondents thought that the volunteers such as the DJs educated the community, out of which 28 per cent of the respondents believed that DJs exerted their influence to successfully change opinions.

¹ Percentages do not total 100 due to multiple responses

In 2004, the FCC rejected 151 identical license applications from the Calvary Chapel. Although designed to increase localism and minority voices in the public sphere, one group of communication scholars criticized that the LPFMs have been taken over by churches and various affiliated schools (Connolly-Ahern et. al, 2009). These religious organizations had mostly expressed support for the LPFMs from the very beginning and in the year after the Report and Order, they aggressively pursued construction permits from the FCC. Nearly half of the constructions permits issued by the FCC in the first filing window went to religious groups, many of which were local congregations who had the backing of national churches. Some experts pointed out that through LPFMs the national churches were forging virtual national networks that were just part of fund raising systems (Connolly-Ahern et. al, 2009).

Although the religious institutions do serve the public interest and also fall under the category of non-commercial organizations, the religious denominations were not part of the earlier debate around the LPFM policy, but still managed to obtain the highest percentage of LPFM stations. William Kennard, FCC chairman who brought the discussion on LPFMs on the table in 1998, believed that LPFM's most important contribution will be to the minority communities as it will provide "opportunities to those who want to use the airwaves to speak to their community" (Kennard, 1998) however, only 22 per cent of LPFM stations were actually being operated by local community and citizen groups.

A recent study revealed that out of the approximately 1000 licensees that were issued in the duration of the project, 233 identified themselves with a national religious organization. Some religious organizations listed the LPFMs as "members" of their organization (Connolly-Ahern et. Al, 2012, p. 33). For example, 15 LPFM stations identified themselves as part of Relevant Radio Network. Another 31 LPFM stations were described as "independent, locally-owned and operated non-commercial, educational FM stations which rebroadcast programming from RADIO 74 INTERNATIONAL network" (Connolly-Ahern et. Al, 2012, p. 33). The three religious networks

most affiliated with LPFM stations are EWTN, 3ABN, and LifeTalk Radio. However, another 54 stations were affiliated with “Calvary” (Calvary Chapel Network) in one way or another (Connolly-Ahern et. al, 2012, p. 34), even though they did not follow any structured “provision of programming”. Similarly, in case of local LPFMs, 8 radio stations – although defined as “independently operated” - were affiliated with Pacifica Network, a listener sponsored community radio.

In hindsight, by removing the commercial aspect of LPFMs, the FCC denied the LPFM service a powerful ally - commercial broadcasters - who could have helped in pushing the LPFM agenda to fruition and would have acted as a source of funds, innovation and initiative. However, ironically the LPFM debate found another powerful ally in the religious groups, who became a dominant force during the formation of LPFM guidelines and continued to be aggressive during the application process. The predominance of religious LPFM stations then raises questions on the nature of the “public sphere” that the LPFMs address and what constitutes the public sphere – is it commercial, spiritual, or socio-cultural? And how does one use the public sphere with a narrower scope due to lack of commercial viability to empower the community?

LPFM and public interest

The FCC has frequently discussed how the LPFM service would cater to the local, marginalized and minority communities. Several countries such as Australia, UK and Canada have used community radio as a way to fulfill their public interest agenda. Providing a media outlet to minority and marginalized groups is part of the public interest goals of the FCC as well. Definitions of public interest have been vague at best and have a fluid element to it as it changes the social, economic or political environment. It is most aptly defined as a standard that reflects the American public’s belief in protecting democratic virtues and values (Robb, 2009). They are a

system of checks and balances that gives the public the assurance that there is someone else other than themselves who is guarding their interest.

The system of community radio is defined as “dialogue and interaction between sender and receiver where the role of the sender and receivers are blurred, shared and exchanged” (Lewis, 1984, p. 144) or as “small, particular, personal type of primary group relationship” (Sampedro, 1997, p. 197). LPFM stations, with their 10 to 100 watts of frequency and range of 5 to 7 miles, is a perfect medium to serve a small community while providing the closeness that ensures personal involvement of the community with the radio station (Sampedro, 1997).

Through the LPFM service, the local community has access to a media source that air community specific information and provide a chance to the community to participate in the decision making process, creating the content, utilizing production tools, and the feedback systems. The FCC’s definition of minority communities is as “under-served” and “linguistic and cultural” groups, and the study uses this definition to identify the LPFM stations that are either owned by or catering to the minority community.

Diversity is an important part of the public interest, but it is expensive and unprofitable for the commercial organizations to produce costly programming content for a very small and specific group of people. Moreover, for any programs that are out of the mainstream fare, the audience will have to pay more heavily than for least common denominator programming.

Generally, advertisers supported broadcasting leads to duplication (Waterman, 2004), and since only advertisers pay for the program that are requested by the majority of the people, programming desired by smaller groups are not provided (Napoli, 2007). Hence, the LPFM system with their noncommercial agenda has the potential to serve the cause of diversity. Moreover, there is a dearth of general interest and minority media that not only address the local and minority groups with specific programs but also present the programs in a manner that is most suited to the their specific culture.

Evidence has been found that owners of radio stations targeting a specific community such as a minority group have often aired content different from the mainstream media and also chosen “formats that appeal to minority audiences” (Turner, 2007, p. 6). It has financial implications for the license holder as “Spanish, religion and ethnic formats attract smaller segments of the market” (Turner, 2007, p. 6) and therefore “average audience ratings share and share of market revenue held by minority-owned stations is significantly lower” (Turner, 2007, p. 6) than the audience and revenue shares of non-minority-owned stations.

However, very few media outlets are owned by or target the minority audience or are committed to public interest. The racial and minority community owns 7.7 per cent of all full power commercial radio stations although they account for 33 percent of the US population. Latinos, the largest minority in United States comprising 15 percent of its population, own 2.9 percent of the radios while they are the largest minority in United States (Turner, 2007).

Even in markets where racial and ethnic minorities are in majority, there is less number of minority-owned radio stations as compared to non-minority station owners. Therefore if the minority-owned radio station serves a market that has a large minority audience then it will air programs that are preferred by its audience.

A study revealed that there were 324 distinct minority-owned commercial radio stations. Out of the 324 stations, 139 belonged to members of the Hispanic community while 129 belonged to members of the African American community. Thirty four radio stations were controlled by Asian Americans, while the rest (14) were owned by Native Americans (Turner, 2007).

Since, promoting local and minority voices is one of the stated objectives of the LPFM policy, this dissertation will explore how these policy objectives are being interpreted by the licensees who are actually responsible for creating content, deciding the kind of programs that would be aired, and the tone and format that would be used by the radio station to reach its audience. Studying three main categories of LPFMs – general interest, minority oriented or

religious – would reveal how three different categories of licensees define needs of community, giving voice to the voiceless and encouraging minority voices through their radio station.

In the next chapter the methodology for the study and the sample will be discussed, the three sources of information will be identified and described. The chapter will also contain the code for analysis and an explication of the core concepts that are being used to understand and categorize policy objectives, and interview responses.

Chapter 4

Methodology

As discussed in the previous chapters, the objective of this dissertation is to add to the growing literature on policy implementation and evaluation by examining the FCC's LPFM policy, thirteen years since its launch in 2000. Using the interpretivist framework, the dissertation aims to gauge how the policy is interpreted and executed by its implementers. This chapter elaborates on the interpretivist methodology, and describes the document analysis and interview procedures used to collect the information that is used in the analysis.

Interpretivism as a methodology has been widely used in other research areas such as media effects (Evans, 1990) and eHealth (Greenhalgh & Russell, 2010; Lilford, Foster & Pringle, 2009). In media effects research, the interpretive media theory works on assumptions of an active audience and open media content. The argument is that media content is "open to individual interpretation by people creating meaning in the process of consumption" (Evans, 1990, p. 147). Interpretivism is also an often-used concept in other areas such as legal studies, where the concept is explained as "the model of judging on which judges confine themselves to reading and interpreting the words of the written constitution" (Primus, 2009, p. 161). Interpretivism is not "shallow literalism", but "judges must often interpret the written text rather than always being able to apply it mechanically" (Primus, 2009, p. 161).

In contrast to positivism- which is "experience in general, and observation and testing in particular" (Clarke, 2009, p. 28) that is "capable of being reduced to relationships of cause and effect" (Durkheim, 1982, p. 33) - interpretivism is based on "subjective meaning" and is related to "empathy and interpretation" (Clarke, 2009, p. 28). Interpretivism is an important tool to study social policies because social structures are different from natural structures as they "do not exist independently of the activities they govern" (Bhaskar, 1989, p.61), they "do not exist

independently of the agent's conceptions of what they are doing in their activity" (Bhaskar, 1989, p.61), and these social structures unlike natural structures "may be only relatively enduring" (Bhaskar, 1989, p.61) and therefore, "social systems are intrinsically open due to the reflexive nature of social action" (Clarke, 2009, p. 28).

In this study, an interpretivist approach is used by the researcher to understand how local broadcast station managers and other decision-makers have interpreted and applied the requirements of the policy in their spheres of action. Broadcast station owners and managers are key decision-makers whose interpretation and application of the regulatory requirements have a decisive impact on the success or failure of the LPFM's goals of promoting localism, diversity and minority voices. This study does not take into account the entire process of policy making, but only the implementation of it and is "a retrospective assessment of public interventions" (Vedung, 2000, p.7). This is the appropriate time to look back at the LPFM policy since more than a decade has elapsed since its launch and the policy has had the space and time to start taking effect and achieve its goals.

The method of interpretation is used not only by the key stakeholders to understand the relevance and objective of the FCC's LPFM policy, but also throws light on how the responses were examined and categorized by the researcher. The method of interpretivism is a philosophy that uses a process of negotiation between reality and subjectivity. In a study using an interpretivist methodology, a scholar's subjective opinions are also taken into account and become a part of the study. To this end, the study of FCC's official Reports and Orders, Reforms and other relevant documents have helped the researcher to identify as clearly as possible the LPFM policy objectives and understand complex terms such as "localism" and "diversity", and judge how LPFM operators are attempting to achieve objectives of encouraging localism and diversity.

First, since LPFMs were created expressly to help increase diversity in broadcasting, to bring new voices in the public platform, and help marginalized and underserved groups, it was decided that the focus of the study would be minority-owned or minority-targeted LPFMs. This choice makes sense because no previous study has examined how station owners and managers at minority LPFMs have interpreted and applied the FCC's regulatory guidelines for LPFM stations. The closest other study available in the literature is Connolly-Ahern et al. (2012), but their focus was on religious broadcasters and examined whether religious LPFMs, especially those who are affiliated to national networks, are successful in providing local content - one of the main goals of LPFM policy.

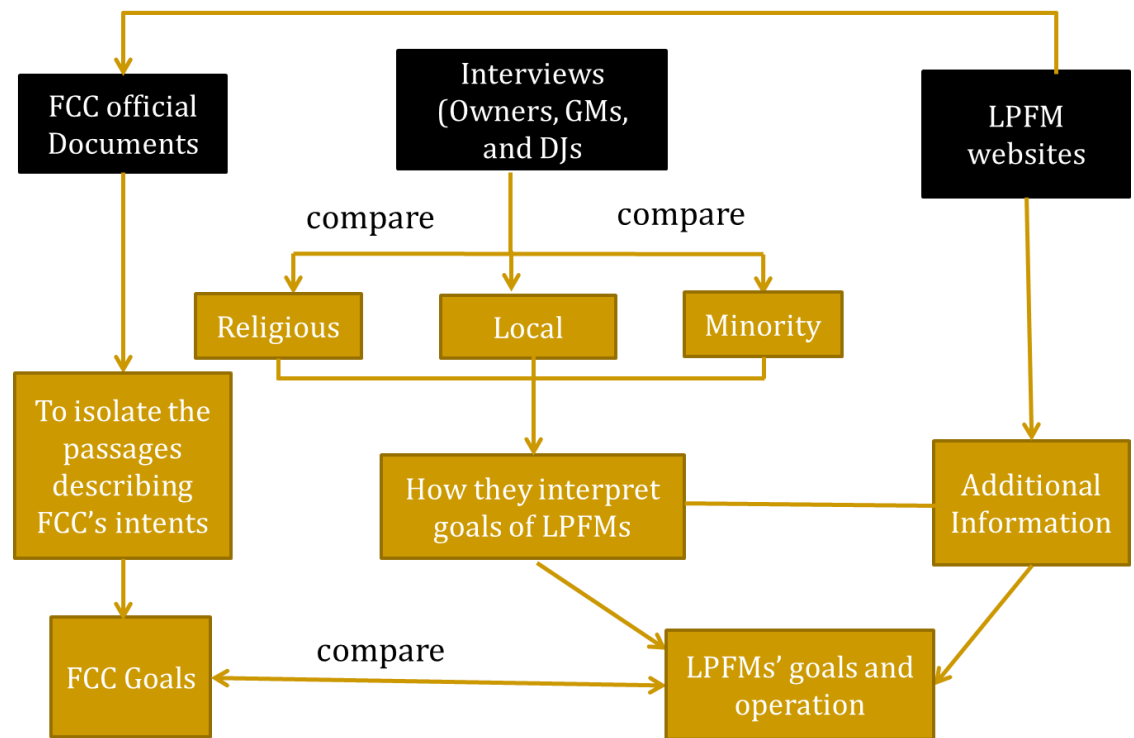


Figure 1: Methodology

There are three sources of data for the study. The first includes the study and analysis of legal and regulatory documents related to LPFM, in order to identify the objectives that were set

for the LPFM policy, since only based on an understanding of its objectives can the success or failure of a policy be judged. The second source of data is interviews with LPFM owners, managers, and volunteers to discover how they identified their target audience, set their content creation priorities, designed programming line ups, and implemented programs, if they had any, to assess local community needs and respond to them. These interviews were also designed to determine if and how different types of LPFMs (such as minority-oriented, general interest, and religious broadcasters) differed in terms of their programming and community outreach strategies.

Finally, the third source of data is based on examining the available websites of all the LPFMs as a source of additional information to understand how accessible the LPFM management is to its audience and how they are using the Internet to support their community. All available materials such as program schedules, mission statements and websites of the LPFMs included in the study have been examined to comprehend if and how the LPFMs were involved in their community; and what kind of topics they covered on their radio station. The definitions of the three terms most important for the study are discussed in the sections below.

Explication of key concepts

Localism

The idea of localism comes from the core concept that informed citizens are crucial and necessary for a democracy that depends on responsible channels of communications to provide information to its masses and include their interests in the public platform. There have been debates among scholars about the failure of media outlets to provide adequate local news and public affairs programming (Yanich, 2010). The philosophy of localism germinated from the idea

of a local marketplace, “which was central to community life before the rise of urbanism”. The free and open marketplace was seen as the “ideal setting for citizens to traffic in both commercial goods and political ideas” (Schwarzlose, 1989).

Several scholars have debated the definition of localism (Schwarzlose, 1989; McMillan & George, 1989; Stravinsky, 1994; Dahlgren, 1995). Localism, however, is a difficult concept to define. It is described as “opinions and a desire to participate in neighborhood affairs” (McMillan & George, 1989). It is an attempt by “(a) relatively small number of citizens to physically gather in the same place at the same time to engage the public sphere” and is a “realm of social life where the exchange of information and views on questions of common concern can take place so that public opinion can be formed” (Dahlgren, 1995, p. 7).

Localism has been defined in two separate ways. Firstly, it is defined geographically, where “any program produced and presented within a local community would be seen as contributing to the fulfillment of the local ideal” (Napoli, 2001, p. 210). This concept is dependent on “local production and thus on local employees” (Napoli, 2006). In this concept “local labor markets” are very relevant for the localism ideology.

The second theory on localism emphasizes on the content. According to the theory, the localism principle is “only fulfilled if the programming addresses the unique needs and interests of the local community” (Napoli, 2001, p. 217). Media scholars have discussed how localism - a cornerstone of US communication policy - “refers to a media system’s ability to address the disparate needs and distinctive interests of local communities” (Howley, 2005, p. 103).

This principle expects a medium of mass communication to “generally ascertain and serve the needs of the local communities it is licensed to serve” (Sohn & Schwartzman, 1994, p. 3). Another definition explains that “local media use” should “connect the person to events and issues of community life” (McLeod, Daily, Guo, Eveland, Bayer, Yang, & Wang, 1996, p.190). It

is a means of “local self-expression” that would “be a forum for the unique talents and characteristics of each community” (Berkowitz, 1983, p. 506).

The FCC has given a lot of importance to the goals of localism in their attempt to provide the amorphous idea of “public interest, convenience, or necessity standard of the Communications Act (1934)” (Stavitsky, 1994, p. 21). The FCC has defined “localism as a vital part of the community life”, and expects a local media station to be “ready, able and willing to serve the needs of the local community” (Stavitsky, 1994, p. 21).

Traditionally, a lot of the media adhered to the spatial definition of localism that led to “production of programs by and for specific segments of the community (e.g., women and minorities)” (Stavitsky, 1994, p. 25). However, gradually the opinions about localism are changing from spatial definitions to “seek to maximize diversity of programming to serve an assortment of audience communities, in accordance with a social conception of localism” (Stavitsky, 1994, p. 28).

Diversity

Diversity is an implied aspect of the mandate of freedom of speech. This aspect is important for a democracy because it allows and demands that different, unique and “divergent points of views” are encouraged because they “nurture an informed, self-governing citizenry and because they promote cultural pluralism” (Horwitz, 1989, p. 280). Diversity “refers to the variety of different programmes, publications, and services that are available, whereas plurality is about the choice can make between different providers of those services” (Freedman, 2008, p. 76).

The term diversity has multiple definitions. The concept can be divided into three broad categories – source diversity, content diversity and exposure diversity (Napoli, 2006). Source diversity includes ownership, programming, and outlets. Content diversity on the other hand refers to diversity of format and/or program type, demographics – “the ethnic and gender

composition of those represented in media content” (p. 4) - and idea and/or viewpoint. The exposure diversity – “refers to the diversity of content or sources consumed by audience members, that of course may be very different from the diversity of content or sources available” (Napoli, 2006, p.4) – includes horizontal and vertical channels.

Other media scholars have divided diversity into two categories, analogous in some respects to Napoli’s classification but with somewhat different emphases – it has either been defined as “diversity of programming content within the (single broadcast) service” (Gibbons, 1998, p. 31) or “external pluralism as ‘a diversity of media service’” (Gibbons, 1998, p. 31). Diversity has mainly been “(t)he presence of different and independent voices”, a platform for “different political opinions and representation of culture in the media” because “citizens expect and need a diversity and plurality of media content and media sources” (Doyle, 2002, p. 11-12).

The concept of diversity describes a world replete with ginormous amount of information on a wide range of topics, flowing from multiple sources and lending itself to debates, comparisons and discussions among different groups of people. It is “beliefs in variety and competitiveness, of a smorgasbord of companies, formats, opinions, styles, niches, and narratives from which audience are free to pick and choose (Freedman, 2008, p. 74).

Diversity as an idea originates from the marketplace ideology that calls for the “widest possible dissemination of information from diverse and antagonistic sources” (Freedman, 2008, p. 74). The concept of diversity focuses on “maximizing both the number of participants in the marketplace and the range of ideas, viewpoints, and cultural perspectives available to citizens/consumers” (Napoli, 2006, p.2).

The FCC in its LPFM documents describes its diversity goals as both diversity of ownership and diversity of voices to provide public platform for small, marginalized, minority and underprivileged groups. This study is partly borrowing the FCC’s definition to understand FCC’s policy objectives and to compare it to how LPFMs are contributing to the diversity both

by giving access to diverse groups of people and also by providing information on diverse topics. To this end, the study has found minority-oriented LPFMs to be an important category of LPFMs that should be examined. However, the term minority is also a complex term that needs discussion and clarification.

Minority

Minority, like diversity, is a difficult term to operationalize. The concept of ‘Minority’ has been much debated among scholars as there is no clear definition to the term and no set guidelines exist as to which communities are a ‘minority’ and which are not. For the minorities to participate in the public sphere as proposed by Habermas (Habermas, 1991), one has to first define the concept of minority. What is a minority?

Defining ‘minority’ is not an easy task (Kymlicka 2005, Browne, 2005, Schejter et. al, 2007; Napoli, 2001; Hacker, 1951). The part of the problem in creating any definition of the term ‘minority’ is that at “most general level – human - nobody is a minority. But, at every other level everyone can be a minority. But, the concept of minority is not just numbers, it is also about who holds power” (Browne, 2005). Minority group are identified as those “that have been traditionally marginalized by or excluded from the discourse in the public sphere, thereby prevented from adding their voice to the development of a national consensus” (Schejter et al, 2007, p. 6). By this definition, several marginalized sections of the community are considered a minority at one time or the other such as women (Hacker, 1951) and senior citizens.

Minority communities have been distinguished from majority in terms of social, political, and economic status, cultural interests, and size of population. Categories of race, caste, region, religion, gender, language, and age come under culture and therefore, minority rights are often referred as cultural rights. ‘Minority’ has been defined as “anyone who identifies him or herself as part of a group that maintains a distinction in language, and/ or culture between itself and the

majority of population” (Browne, 2005), which include people with foreign origins such as first émigré and his consecutive generations, and indigenous groups.

Similarly, minority has also been described as a group numerically inferior to the rest of the population of the state, a “group with a non-dominant position in society; a well-defined and historically established group that resides on the territory of the state; a group with ethnic, religious, linguistic or cultural characteristics different than those of the rest of the population; a group with a sense of solidarity, directed toward preserving its culture, traditions, religion, or language” (Schejter et al., 2007, p. 5). Scholars have identified race as another factor through which a minority community can be identified. Any community belonging to a race other than the racial identity of the majority community has been called a racial minority (Pager & Shepherd, 2008; Nickens, 1995). Scholars have discussed racial discrimination as an “unequal treatment of persons or groups on the basis of their race or ethnicity” (Pager & Shepherd, 2008, p. 182) or discussed how the concept of minority is defined as any group that “designate populations that are racially or ethnically different from the majority” (Nickens, 1995, p. 153) and that as a “group are relatively poor and powerless, and socially marginalized” (Nickens, 1995, p. 153).

Moreover, ethnicity also depends on being identified as an ethnic minority that includes a self-perception of ethnic identity and an acknowledgement of being an ethnic minority from the peers, for which documented evidence is often necessary. Minorities, especially in the Western world, are basically identified in four groups – indigenous, national, ethnic, and linguistic. The term minority has also been defined as a group of people, who are unable to enjoy “the full rights of membership within a political community because their religion, race, language or ethnicity differs from that of the official public identity” (Preece, 2005, p. 10). The term has also been defined as a group of people who have either an agenda different from the majority (Packer, 1996) or any community that is powerless due to cultural or religious domination of the majority (Ramaga 1992).

The FCC defines marginalized groups in its LPFM documents as “linguistic and cultural minorities or groups with shared civic or educational interests that may now be underserved by commercial radio and higher powered noncommercial radio stations” (FCC, 2000, p. 9). Similarly, this study borrows the definition to partly explain the category of minority LPFM, which would also include racial and ethnic minority communities.

While analyzing the FCC’s official documents, the Commission’s definition of localism, diversity and minority has been used in identifying the policy objectives of the LPFM initiative and to examine the interpretations of the LPFM operators. The methods used in this dissertation to collect each of these three types of data are described in the sections below.

Document analysis

When the LPFM policy was first initiated through the FCC’s Notice of Proposed Rule Making, the Commission explained that the new service was intended to serve three purposes: address the needs of community; foster opportunities for new radio broadcast ownership; and promote additional diversity in radio and program voices (Smallwood & Newton, 2006). However, these objectives were to undergo significant changes as the proposal evolved through the regulatory rule-making process. This is evident in the documents, available in the FCC website, pertaining to the FCC’s decision of initiating the LPFM service and the subsequent changes in the policy through several Reports and Orders, Reconsiderations, and Notices of Proposed Rule Making - all documents that discuss various aspects of LPFMs such as content, operating protections, channel protections and programming.

Although these documents also include discussions about technical aspects of LPFMs such as station identification, license terms, and filing process, this study mostly analyzed sections that discussed the goals and objectives of LPFM, relative to program content, ownership

and licensing requirements, operating hours and any technical detail such as channel protections that might affect the diversity and localism goals of the community radio station. Three topics in the documents were especially focused on – goals and objectives, the discussion about how and where content should be created, and channel protections - that directly affected the objectives of giving voice to the “voiceless”, creating a public platform for small and marginalized communities, and giving everyone an opportunity to create and present content that is important to them.

The analysis concentrated on how the FCC defined their goals and objectives, and who the targeted beneficiaries of the policy were. The way these objectives were defined or described revealed how LPFMs were meant to be used by the licensees. Similarly, studying the guidelines on content revealed the FCC’s preferences on local content and community service. Technical decisions on operating hours and channel protections helped understand how the policy design affected the goals and objectives set by the policymakers. Finally, analysis of the documents helped in understanding if the policy addressed all aspects of the radio station well and if the policy was sufficiently detailed and fleshed out to make the success of its goals possible.

Even though during the process of formalization of the policy and in the subsequent reconsiderations, certain changes such as turning LPFMs into a non-commercial service and limiting its frequencies in cities and urban areas, have affected the extent of its contribution to the emergence of local community and minority voices, it still carries the potential to give small and marginalized groups the programming and the platform that is specific to fulfilling their needs. Because LPFMs are a small sized non-profit endeavor, the service has filled the niche carved by the “under-met” masses, fulfilling a societal as well as political and cultural role that would have otherwise remained unfulfilled by the commercial radio service and other larger radio stations owned by non-profit organizations.

Interview data collection

Around a thousand LPFM stations were licensed in the year 2000. By 2009, 800 LPFMs were still working (Dunbar-Hester, 2010, p. 3). The objective of this stage of data collection was to conduct interviews with LPFM owners, managers, and DJs at a representative sampling of LPFM stations. Since the objective was also to study how different kinds of LPFMs—religious, general interest and minority—are interpreting and applying regulatory mandates, the sample chosen needed to give adequate representation to all these types of LPFMs. For the purpose of this study, “minority stations are defined as those, who explicitly claim on their mission statement or website that they serve an ethnic or linguistic minority community. Similarly, “religious stations” are those that have an explicit statement of a religious programming orientation, or identification with a religious group in their mission statement or website. “General interest stations” are those that did not have a minority or religious mandate on their mission statements or websites. All 800 LPFM call names were searched on the Internet to find their individual websites to identify the minority, religious, and general interest LPFMs. Thirty eight LPFMs were identified as minority by examining their websites and mission statements. Since this was only a very small percentage of all LPFMs, the entire population of minority-oriented LPFMs was included in this study; for comparison, a number of religious and community stations were also included, selected through purposive sampling. The sample selection methods are described below.

To begin selecting the main population of LPFMs, an initial list of all LPFMs currently in operation was compiled from the official FCC website². All available information was collected including addresses, geographical locations, names of LPFM licensees, LPFM websites and in some cases, contact information. In cases of missing information, web portals such as

² <http://transition.fcc.gov/fcc-bin/fmq?state=&serv=FL&vac=&list=2>

www.radiolocator.com and www.tunein.com were consulted to obtain complete data. Since the FCC does not categorize LPFMs on terms of its orientation; the LPFMs were divided into religious, general interest and minority radio stations by the researcher. The LPFM stations' self-descriptions and information on their websites were used to classify all LPFMs into categories: general interest, religious, minority, music stations, educational - LPFMs that are used as learning tools for schools and universities. The process of classification was aided by the way radio station employees and volunteers described the LPFM on their websites, the type of activities they advertised in the website and information about the licensees. The websites that were in language other than English were put in the minority LPFM category along with those LPFMs that described themselves as catering to a minority community. LPFMs that defined their objective as mainly providing religious teachings and spiritual messages were classified as religious LPFMs and the low power radio stations that described their services as catering to the information needs of a local community were put in the general interest community LPFM category.

Since the primary focus of the study was minority-oriented LPFM stations, all the LPFM stations—a total of thirty eight radio stations—which either used a minority language such as Chinese or Spanish, or identified themselves as catering to a racial or ethnic minority community in their mandate were selected for the study. However, the objective was also to compare how different kinds of LPFMs—religious, general interest and minority—are interpreting and applying regulatory mandates, and hence, the sample chosen needed to give adequate representation to all the three types of LPFMs. Accordingly, for each minority LPFM, a set of general interest and religious LPFMs were selected that were located in an area that had similar demographic makeup to the localities housing minority LPFMs. In order to find comparable set of radio stations in the general interest and religious categories, the demographics of the geographical region of the general interest and religious LPFMs were compared to the demographics of the geographical regions of the minority LPFMs. Initially, a list of general

interest or religious LPFMs in the same city or town as the minority LPFMs was compiled. However, not many LPFMs are located in the same city or town. Hence, making use of the U.S. Census Bureau data³, the Metropolitan Statistical Area (MSA), and the Combined Statistical Areas (CSA) of all LPFMs were collected. For each minority-oriented LPFM, a general interest or religious LPFM located in the same, or neighboring or proximate MSA with similar population and demographics was identified. The contact information for all selected stations was gathered from the FCC website, the individual websites of the LPFMs, and community websites such as *blackradio.com*.

For comparison, a number of religious and community stations were also included, selected through purposive sampling. Purposive sampling is often used in situations when groups occurring with relatively low frequency in the general population need to be included in a sample, or when comparisons need to be made to these groups. The technique is defined as “selecting units (e.g., individuals, groups of individuals, institutions) based on specific purposes associated with answering a research study’s questions” (Teddlie & Yu, 2007, p.77). Purposive sampling is employed to select “Particular settings, persons, or events [that] are deliberately selected for information they can provide that cannot be gotten as well from other choices” (Maxwell, 1997, p.87). The method of purposive sampling is a method of interviewing “people with a broad knowledge of the topic or those who have undergone the experience and whose experience is considered typical” (Morse, 1991, p. 129). In purposive sampling methodology, a sample is selected with a purpose in mind and not randomly. This method is used when “sampling special or unique cases—employed when the individual case itself, or a specific group of cases, is a major focus of the investigation rather than an issue” (Teddlie & Yu, 2007, p.80).

Purposive sampling has been extensively used in ethnography and ethno-botany research. It has also been used for studying the new media (Herring, 2004; Howard, 2002; Johnson &

³ <http://www.census.gov/population/metro/>

Kaye, 2004; Schultz, 2000), while other studies with similar research objectives (for example, Connolly-Ahern et al., 2009 & Connolly-Ahern et al., 2012) have used purposive sampling as well.

Table 4-1. Average population and racial compositions of MSAs of sampled LPFMs, by type

Types of LPFMs	Population (Avg.)	Racial Composition					
		Caucasian (non-Hispanic white)	African American	Native American	Asian	Hispanic (of any race)	Native Hawaiian /Pacific Islander
Minority	1,108,489	66.2%	10.1%	0.9%	7.3%	24.4%	0.8%
Religious	4,410,769	62.2%	14.8%	0.6%	8.4%	25.8%	0.1%
General Interest	2,521,866	53.7%	8.3%	0.7%	14.8%	36.6%	0.8%

Source: US Census Bureau

Despite these efforts to ensure the comparability of the MSAs of the LPFMs, the data shows that the demographics and population have some variation across LPFM type. Most notably, the religious LPFMs in the sample were located in somewhat larger MSAs by population, compared to the minority LPFMs. However, given the variability of the population and demographics of the MSAs in the United States, these differences are not very large.

Once a list of LPFMs was identified, the stations were called and, in the case of some radio stations, emailed to inform them about the research and request participation. Interviews were requested with employees, owners or volunteers of LPFM stations. Once an interviewee agreed to participate in the study, personal email information was exchanged so that consent statements could be mailed to the prospective participant. After the consent statement was sent, read and understood, a time and date for the interview was fixed and on the assigned date the interview was conducted. Responses by LPFMs to an interview request were varied. While personnel at many LPFMs willingly participated in the interview, several LPFMs refused to participate entirely and few needed some persuasion to take part in the interview, a couple of

interviewees refused to give their names and two interviewees refused to answer some of the questions asked during the interview. From the population of 38 minority-oriented LPFMs, 34 minority-oriented LPFMs were contacted, out of which only 16 minority-oriented LPFMs were successfully interviewed. After matching the demographics of MSAs that housed the minority-oriented LPFMs with MSAs that contained religious or general interest LPFMs, 20 religious and 28 general interest LPFMs were selected. Ten religious LPFMs and 13 general interest LPFMs were successfully contacted, out of which only seven religious and seven general interest LPFMs agreed to participate in the interview.

Interviews: A method of in-depth interview is the source of primary data collection for the study. The sample size is substantially smaller than quantitative methodology because the interview was designed to collect large amounts of information from each respondent. Since the information collected in this manner could not be easily categorized, the analysis relied less on counting and more on interpretation, summary and integration. Qualitative interview is often the chosen method of data collection for scholars using the interpretivist theory as this methodology allows for coherence, depth and density (Weiss, 1995), and the depth and development, possible through open-ended questions, help in understanding a situation. Similarly, although the number of the religious and general interest LPFMs did not match the numbers of interviews collected from minority LPFMs, this qualitative study is not intended to be generalizable, making the number of responses less material to the outcome of the study compared to quantitative analyses. The goal of this study is to collect as much information and description as possible from each respondents so that the study can categorize, and apply an interpretivist approach to understand the opinions of the respondents toward the LPFM and its role in the community.

All of the interviews were conducted by phone. The method of telephone interview was chosen for the research not only because it is convenient and less daunting for the interviewees but also because the sample was from all over the country and face to face interviews were

difficult to arrange. The telephone interview was a preferred method of data collection as compared to survey to ensure reliability of answers as some questions in the questionnaire were divided into several parts and if read at the same time, would have lead an interviewee to give the desired response and bias the interview.

The process of collecting interviews revealed that LPFMs catering to the minority LPFMs were most open to being interviewed followed by general interest LPFMs. The religious LPFM operators were the hardest to contact and least forthcoming during the interview. This reluctance may have been because of a number of factors: to speculate, due to the greater insularity of some (especially religious) LPFM operators and their unwillingness to communicate with outsiders; some operator's awareness of non-compliance with FCC policy; lack of knowledgeable personnel at small LPFM stations, etc. Those LPFM operators that agreed to be interviewed were likely to be more open to outside communication, confident that they were fulfilling the mandate of the policy, and more knowledgeable and articulate about their mission. It leads to speculation that the results of this study overestimate compliance and that actual levels of implementation and compliance among all LPFMs (and especially religious broadcasters, who disproportionately declined to be interviewed) is poorer than revealed by the interview data.

Questionnaire: As a guide to these interviews, three questionnaires were designed for each type of LPFM personnel interviewed: owners, managers and programmers. A set of twenty questions were asked in each of the interviews. Additional questions were asked for further explanation, if needed. The questionnaire was divided into four parts. The first part asked questions about the size of the transmitter, the location of the radio station and the distance that the broadcasted programs could be heard in the locality. The second part sought information about the target audience of the radio station. It discussed the problems that their community was currently struggling with and if the LPFM workers were addressing these issues in their programs. This section of the questionnaire helped in understanding how well the LPFM workers

knew their audience and whether they were aware of the community's problems. For example, the LPFM workers, who clearly define their audience, are bound to be more aware of the needs of the community as compared to those LPFM workers who are not clear about the audience they are targeting with their programs. The answers given by the respondents helped in understanding to what extent LPFM owners and other personnel understood the goals and objectives set by the FCC and if their operations coincided with these.

The third section of the questionnaire discussed the kinds of programs that the radio stations air such as entertainment (for example, music), and information (health, education or economy, news and current affairs, opinion pieces or debates). The section discussed how many hours of entertainment were aired every week as compared to the number of hours of information. This section also included questions regarding the kinds of informational programs that were aired and whether they were political in nature or included cultural content, or provided financial information.

The fourth section of the questionnaire discussed audience participation. It examined whether and to what extent the audience was encouraged to participate in the programs, whether they were invited to create content and if their questions and concerns were entertained. This section explored how accessible the radio station was to its community. It also discussed how the LPFMs contributed in providing financial opportunities to the community they catered to, and whether the radio station involved people from the community, and if community members had the opportunity to apply or volunteer for positions in the radio stations. This section also discussed if the LPFMs participated in promoting any outreach projects and underwrote local small businesses. Answers to these questions reveal how involved the radio stations are in their community and whether they are helping the community by creating, informing or promoting financial opportunities.

Finally, the questionnaire asked the LPFM personnel for their opinion about how LPFMs were helping people from minority, local and marginalized communities to get a voice in the public sphere, how the “needs of the community” could be addressed through LPFM programming, and how successful the station owners, general managers and DJs think the LPFM initiative has been. Once all the interviews were conducted, a qualitative comparative analysis of interview answers was employed to understand the role of LPFMs in creating a public platform to facilitate the community. All the identified minority and non-minority LPFM stations were studied for uniqueness of their format, language, speech patterns, and quality of interaction.

The third and final source of information consulted for the study was the LPFMs’ own website that contained its mission statements, program schedules etc. As a source of additional information, the working websites of the included LPFMs were studied to examine their programming schedule, mission statement and homepages in order to scrutinize what kind of topics were regularly discussed, if a wide range of topics were included in the weekly program schedule, how many hours were spent on talk shows and entertainment, how the goals of the LPFMs were discussed, and if the homepages advertised community projects, list community events, introduce the DJs and include contact information. The examination of the websites helped in providing additional information to understand how LPFM operators wanted to present their radio stations and utilize the Internet to further interact with and discuss their community.

In examining both the interview responses and LPFM websites, the researcher was careful to avoid making erroneous judgment, as both interviews and websites are methods of self-presentation and cannot be taken to be statements of absolute fact. Although websites elements such as program schedules were studied to get a clearer idea about what kind of programs were broadcast by the LPFM, it is also possible that the content actually broadcast did not conform to the publicized program schedule. It is possible that just as the programs reported by the LPFM operators in their interviews might be an exaggeration on the interviewee’s part as a way to

generate approval of the interviewer, similarly, the program schedule included in the website may also not be accurate as it is another form of self-presentation and can be misreported. Therefore, program schedules might include programs in their schedule that were broadcast in the past or were not very frequently aired or exist at all.

Nonetheless, the study of available websites of LPFM stations helped in further understanding how LPFMs view their programming and community service missions, promote themselves online, describe their objectives for their radio stations in their mission statement and finally, participate in promoting community projects and respond to audience correspondence. It also offered an opportunity to understand how the LPFMs portray themselves in public; whether they have a political, cultural and social agenda; and how often the radio station employees or volunteers interact with the community. Even factors such as how often the websites are updated revealed how eager LPFMs are to inform and include its audience. It emerged that the LPFM websites that gave local information and advertised community projects were more involved with the community.

The analysis of the website was divided into three sections: mission statement, program schedule, and homepages.

Mission Statement: The mission statement available in websites helped in understanding how they identify their audience and what they intend to do with the radio stations. How they differentiate between their communities and other communities around them? Is it language, culture, race, or ethnicity? What are their goals and how are these goals different from that of mainstream media? Are they able to fulfill these goals? Are the goals to provide financial, social, and political information or simply providing entertainment, and spiritual information? Do they have a political mission? If yes, what are they and how are they bringing it to fruition? Studying the mission statement also revealed how defined the LPFM owners objectives were. For example, if the mission statements explain that the LPFM is put in place to inform the local community

about health, education and job opportunity, then it has a clearer objective than the LPFM whose mission is to entertain and inform its listeners.

Program schedule: The program schedule also gave a clear idea about what kind of programs are aired and how many hours in a week is spent on airing informational programs as compared to the hours spent on providing music content. How many times the programs are repeated and what types of programs are aired? Do they have programs that encourage discussion and debate; do they have programs that discuss current events and politics? Are there programs that discuss local and minority cultures?

Homepages: Homepages also offered a clue on how LPFMs were contributing to and participating in the community. Some home pages advertised community projects; some of them included a section for live chats to facilitate interaction between the radio station workers and their audiences, while others only discussed the message they intend to spread through the LPFMs. Naturally, the LPFM website that include chatting or community projects is interacting with its community more and is more accessible for anyone who wants to communicate with the radio station. The homepages were also studied to understand whether LPFMs created social awareness by broadcasting news programs or promoted a political ideology. Therefore, studying homepages was an important tool to understand LPFM owners' plans and agendas with its radio stations.

In the next chapter, data collected from the three sources of information, as identified in Chapter 4, Methodology, will be presented and analyzed. This includes the analysis of key FCC documents to identify the goals of LPFM policy; the analysis of interviews with LPFM station owners, managers and DJs; and the review of the LPFM's stations websites, program guides, mission statements etc. The objective is to analyze and compare how key personnel at minority-oriented, religious and general interest LPFMs have interpreted and applied the FCC's goals and objectives for diversity and localism in their programming.

The next chapter will also include comparison of FCC's LPFM policy agenda and the objectives of the LPFM licensees to understand how the targeted stakeholders at the ground level interpret the objectives of the policy and the methods they use to achieve them. It will also examine how the result of a policy is visualized by the policy makers and designers, and how the policy is incorporated by the implementers. In addition, the chapter will also examine how various types of LPFMs set different goals for their radio stations and the differences, if any, in their objectives and content.

Chapter 5

Analysis

Based on the methodology outlined in the Chapter 4, this chapter analyzes how key personnel—station owners, managers, and DJs—interpret and apply the objectives of LPFM policy as outlined by the FCC in its regulatory documents. It compares three sets of data—analysis of official documents, interviews with LPFM station personnel, and as a source of additional information, the examination of program schedules, mission statements and homepages of available LPFM websites. The intention is to understand if and how, the programming and outreach efforts of selected LPFM radio stations fulfill the “goals of LPFM policy” in terms of diversity and localism as specified by the FCC. Three different types of LPFMs are analyzed, including minority-oriented, religious and general interest LPFM stations.

This chapter is divided into three sections. The first section contains a detailed discussion of the main set of official documents related to LPFMs and available at the FCC website. To understand the intentions of the FCC, a subset of FCC documents that either implicitly or explicitly mentions the goals of the LPFMs have been selected and tabulated. The documents included are selected from a set of 300 documents available at the website. It has been tabulated and categorized to understand how the FCC spells its policy positions in its various official intimations. The table lists the FCC’s goals in several categories, such as programming, ownership, and nature of service.

The second section includes the analysis of the responses collected through the 30 interviews of owners, managers and volunteer DJs of the selected LPFMs. The documents include the opinions of various respondents on topics such as programming, their target audience

and the problems faced by their community. These goals are then compared to the FCC's goals previously synthesized from selected FCC documents to examine if the goals set by the FCC are similar to the objectives of the LPFM personnel. This stage of the research also compares the responses of station personnel at the three types of LPFMs, minority-oriented, religious and general interest LPFM stations

The third section contains the analysis of data collected from the available LPFM websites. This analysis is not only important to understand how the LPFM workers are using the Internet to achieve their stated goals, but also as a source of additional information to analyze the claims made by LPFM owners and employees, in terms of using their programming and community outreach efforts to advance the goals of the LPFM program.

Findings

Analysis of FCC documents on LPFM

Around 300 documents pertaining to LPFM policy are available at the FCC website. However, not all of them discuss or even mention LPFM goals. A subset⁴ of these documents was selected that either directly mentioned the goals of LPFM policy, or announced policy actions or decisions that implicitly or explicitly revealed the FCC's preferences regarding the goals of LPFM policy. The documents were carefully studied to isolate, examine, categorize and cross-tabulate the passages that discussed or described stipulations on matters of content and programming, operating hours, criteria for the selection of LPFM licensees. This approach is consistent with the "interpretivist" framework of the analysis, which argues that explicit statements of the objectives of policy are often incomplete, and a more complete picture emerges

⁴ See Appendix C

from the observation of the totality of regulatory activity, including statements, decisions and actions.

The documents available in the Federal Communications Commission website discuss the technical, content and ownership aspects of Low Power Frequency Modulation (LPFMs) stations. Among the first documents studied were FCC's Notice of Proposed Rulemaking (NRPM), released in January 28, 1999 and Report and Order, released in January 2000. Both the documents discussed the reasons for initiating the LPFM Service by the FCC. These documents include various regulations for interference protection, discussion of terms such as "localism," "marginalized groups" and "needs of the society." They also discuss technical details such as height of transmission tower, status of LPFMs vis-à-vis FM boosters and translators, and requirements for filing LPFM license applications. The subsequent FCC documents such as Second, Third, Fourth and Fifth Report and Orders, several notices of rulemaking, and various reconsiderations discuss changes in LPFM policies on issue of interference protections, and clarifications on operating hours, availability of license, and assessing the needs of the community in response to comments filed by various stakeholders. In addition, there are several press releases announcing the opening and closing of filing windows.

In Notice of Proposed Rulemaking, adopted January 28, 1999, FCC explained the need for low power radio station had emerged as "hundreds of commenters have urged the Commission to create opportunities for low power, locally oriented radio service" (FCC, 1999, p.3). The FCC expected the low power stations to function "as a service for an ethnic community dispersed throughout an entire city, as a supplementary commercial or noncommercial service, or simply as a low cost community service used principally to convey information to listeners, without concern for financial support" (FCC, 1999, p.3). In the Report and Order, adopted on January 20, 2000, FCC explained that the LPFMs had been initiated to provide "opportunities to new voices to be heard and ...ensure that we fulfill our statutory obligation to authorize facilities

in a manner that best serves the public interest” (FCC, 2000, p. 2). The two categories of service – LP100 and LP10 – were initiated: LP100 was intended to help “noncommercial educational entities such as churches or other religious organizations, community organizations and activists, musicians and other citizens” to start “local stations that are strongly grounded in their communities” (FCC, 2000). The LP10 category of service of very low transmitter power was designed to “serve very localized communities or underrepresented groups within communities”.

Prior to the Report and Order (FCC, 2000), several commentators, media activists, and interest groups had submitted comments to the FCC supporting the creation of commercial LP1000 radio services - as a tool for providing economic opportunities to minority, marginalized and local communities. However after consideration, the FCC rejected the idea because it wanted the LPFM stations to be accessible to noncommercial, educational and public safety entities. It designed the LP100 service to provide a “reasonable coverage area while remaining small enough to continue focusing on local needs” (p. 6), and expected the LP10 service to be suitable “for school campuses and local community organizations that wish to serve small communities and do not have the resources to construct and operate high powered facilities” (p. 6).

In FCC’s opinion, the LPFMs were intended to help cater to “communities of moderate size and interest groups that are geographically proximate such as ethnic, professional, industry and student groups, and retirement neighborhoods” (FCC, 2000, p. 7). Hence, while deciding on the interference protections, FCC imposed a first and second adjacent channel protections⁵, but did not initially impose third adjacent protection channel arguing that “any risk of interference from LPFM stations of 100 watts or less is small and, on balance, is outweighed by the benefits of this new service” (FCC, 2000, p. 37).

⁵ Distance separation requirements are based on a desired-to-undesired signal strength ratio methodology and are designed to permit the reception, generally, of a “desired” station throughout its protected service area. Co-channel protection is based on the “desired” signal providing a signal strength of at least 40 dB greater than an “undesired” co-channel signal and 6 dB greater than an “undesired” first-adjacent channel signal within the “desired” station’s protected service area” (FCC, 2000, p. 3)

As stated in the Report and Order, the service was initiated for encouraging “diverse voices on the nation’s airwaves and creating opportunities for new entrants in broadcasting” (FCC, 2000, p. 8). In order to make the service suitable for small and minority communities, FCC designed it as noncommercial so that diverse voices and points of view could inform and serve the local public. It was intended to introduce new voices on the air waves and allow local groups to provide programming responsive to local community needs and interests. As compared to commercial radio stations that “have commercial incentives to maximize audience size in order to improve their ratings and thereby increase their advertising revenues” (FCC, 2000, p. 9), LPFMs were meant to “foster a program service responsive to the needs and interests of small local community groups, particularly specialized community needs that have not been well served by commercial broadcast stations” (p. 9).

The LPFMs were also to serve the “linguistic and cultural minorities or groups with shared civic or educational interests that may now be underserved by advertiser-supported commercial radio and higher powered noncommercial radio stations” (FCC, 2000, p.9). Moreover, the service was expected to provide ownership opportunities for new entrants as well as “add additional diversity to radio broadcasting and serve local community needs in a focused manner” (FCC, 2000, p.9). Moreover, LPFMs were also meant to be used for public safety purposes, which furthered the “goal of better serving local communities”.

In congruence with the LPFM program’s non-profit and educational mandate, only those applicants that are a government or public educational agency, board, or institution, or a private non-profit educational organization are allowed to apply. In their Second Report & Order, the FCC explained that local licensees will be preferred because local entities with roots in the community are more attuned and responsive to the needs of the community, which have heretofore been underserved by commercial broadcasters. The Commission further pointed out

that an “applicant who is familiar with the community is likely to be aware of its special needs” and “benefit to a community of multiple community-based voices” (FCC, 2005).

To ensure that the licensees will be truly local, the FCC declared that it would use “ownership attribution” as a criterion in allocating licenses, expressing a preference for giving licenses to a local organization or a chapter of a national organization that “is separately incorporated; and has a distinct local presence and mission.” In addition, FCC expected the local entity to be able to “show a significant membership within the community as well as a local purpose that can be distinguished from its national purpose.” These decisions on the transmitter’s power, application process and interference protection further clarified the FCC’s intention to use the LPFM program to give broadcast opportunities to local entities and small non-profit organizations.

Another indication of the FCC’s preferences regarding LPFM licensees could be found in the criteria used for selecting a licensee out of multiple applicants. In the First Report and Order, and in all subsequent documents including the Fifth Report and Order released in March 2012, the FCC explained that desirable licensee (out of multiple applicants) would be judged on three criteria: established community presence; proposed operating hours – “applicants that pledge to operate at least 12 hours per day will be assigned one point” (FCC, 2000, p. 57), instead of the 5 hour per day requirement for other LPFM licensees; and local program origination. Established community presence will be judged by whether the licensee can establish that the LPFM is physically headquartered in the community, with 75 percent of its board members living within the 10 miles of “the reference coordinates of the proposed transmitting area” (FCC, 2000,p. 57). Applicants were also expected to have at least eight hours of original local programming, defined as programs produced within 10 miles of its headquarters. By stipulating local program origination as a condition for successful applications, the FCC reiterated its goal of “addressing unmet needs of community-oriented radio broadcasting” and “community self-expression”.

However, the stipulation of local program origination was only employed to choose from multiple applicants, and was not a rule for licenses that did not have competition. Hence, instead of putting forward clear guidelines about which programming will be considered “responsive to community needs,” the FCC assumed that the locally originated programming it advocated will automatically reflect “the needs, interests, circumstances or perspectives that may be unique to that community.”

Similarly, even though the FCC required specific minimum operating hours, the LPFMs station owners were also given the discretion to mix local and non-local programming. Although the FCC encouraged locally originated programming as a licensing preference (in case of multiple applicants) and mandated that LPFMs may “not be permitted to operate as a translator, retransmitting the programming of a full-power station” (FCC, 2000, p.66), it did not impose any specific requirements for locally originated programming on LPFM licensees as it assumed that the nature of the service, along with the eligibility criteria and preferences that the Commission was adopting would ensure that LPFM licensees provided programming responsive to the local needs (FCC, 2000).

A memorandum, released in August 2005, further reiterated the goal of promoting ownership diversity by stating that FCC will not allow any broadcaster or other media entity subject to “our ownership rules to control or to hold an attributable ownership interest in an LPFM or enter broadcast related operating agreements with an LPFM licensee” (FCC, 2005, p. 2). Similarly, in *Second Order and Reconsideration* adopted in March 16, 2005, FCC defined LPFMs as “cooperative efforts between local community groups,” even though there was no mention or explanation of the goal for which LPFMs were created.

In its Third Further Notice adopted in July 12, 2011, the role of LPFMs were differentiated from other low power services such as FM translators⁶, by explaining that although FM translators were also low power services they did not originate programming. In addition, an FM translator was not required to air programs that “provide significant treatment of community issues or maintain issues/program lists.” The Commission said that LPFMs would better serve the “needs of the community,” arguing that “translators cannot be expected to provide meaningful local service, at least in larger markets” (FCC, 2011, p. 7)

In summary, though the primary concern of the documents cited above were with technical and operational specifications for LPFM stations such as the height of the transmission tower, the filing process, protection from interference for commercial radio broadcasts, a close perusal of the documents⁷ also reveals the FCC’s goals regarding local ownership, non-commercialism, community service, diversity of voices and small-scale operations.

Interviews

As discussed in Chapter 4, Methodology, a total of thirty interviews were conducted with key personnel (owners, managers and DJs) at three types of LPFM stations: sixteen personnel at minority community radio stations; seven at religious radio stations; and another seven at LPFM stations that catered to the local community⁸. Of these LPFMs, twenty also have websites - which include a mission statement, program schedule, live streams of their programs and resumes of the DJs, and advertisements for local events.

⁶ An FM translator is “a low power service on the FM broadcast band that complements the primary FM service and was created to allow FM stations to provide supplementary service to areas where direct reception of radio service is unsatisfactory due to distance or intervening terrain barriers” (FCC,1970)

⁷ *Appendix B*

⁸ *Appendix A*

The primary method of data collection, the interview questionnaire⁹, was divided into four categories of questions: (1) about the technical specifications of the transmitter, ownership, funding, and broadcasting hours; (2) about the LPFMs' community and its interaction with the community; (3) about programming; (4) about audience participation and feedback. Each section of questions focused on collecting information to answer one of the four research questions.

The questions in the first section were designed to cross-check the data available in the FCC database, as well as to set a conversational tone for the more open-ended questions to follow. The second section of the questionnaire helped understand how the station viewed its community, needs of the community, and its programming in relation to the problems faced by their audience. They sought to determine how involved and aware the LPFM personnel were with their community, how aware they were of issues faced by their community, and whether they aired programs that created awareness of or offered solutions to these problems. The third section of the interview questionnaire included questions about how much of the content was locally produced. It enquired about how much of the programming was created by the community and if there were rules set to judge what kind of programs could be aired in the radio station. And finally, the interview queried whether the LPFM station encouraged all the sections of audience equally to produce programs. This section of the questionnaire collected information to answer the research question on how do LPFM stations operators ascertain, define and participate in the political, linguistic and cultural, social, religious and financial interests of their community.

In the fourth section of the interview, the questions about audience participation included enquiries such as how were the audiences encouraged to participate and how frequently did the audience contribute by providing content and comments about programming? Were the suggestions received incorporated in the programming? Were the comments received by the radio station mainly about entertainment or were they about the political, cultural, social or religious

⁹ *Appendix D*

content? How responsive were the LPFM owners and managers to audience feedback, and did they invite community participation in station's decision-making? This section of the questionnaire helped in answering the fourth research question - how, if at all, are the FCC's goals of increasing diversity and encouraging localism being addressed by the general interest, religious and minority LPFMs? How do the three different kinds of LPFMs interpret and implement the goals set by the FCC?

Finally, the fifth section of the interview evaluated if, and how, the station and its programs helped the community and what role the respondents saw for themselves in empowering local and marginalized groups. The interviews asked whether LPFMs have been instrumental in starting a debate on matters affecting the local community. The responses to this question explored if there were some marginalized sections of the community that felt unmotivated to participate in creating content for and send comments to a local low power LPFM specifically designed to cater to their needs. The analysis of the fourth section of the questions revealed how the community participated in and contributed to the operations of the LPFM station. The responses to these questions helped in exploring what function the LPFMs' were trying to fulfill in their communities through their programming.

As discussed in the methodology chapter, all interviews were conducted over the telephone, based on a pre-designed questionnaire. The answers collected from the interviews were classified according to a code designed to assess the depth of the response (see Table I).

Table 5-1. Code to analyze interview responses

	Most knowledgeable	Medium knowledgeable	Minimum knowledgeable
Audience	Respondents provide clear and specific answers about community demographics and target audience.	Respondents describe community demographics and target audience with some clarity, but appear to be unaware of the other sections of the community.	Respondents describe their audience in very general terms or claim to have little or no knowledge of their community or audience.
Goals	Respondents describe their goals at length, and can explain how their content relates to the community	Respondents can describe their mission but cannot articulate the motivation behind it.	Respondents cannot clearly identify station goals.
Community	Respondents discuss the problems faced by the community in detail and can explain how the LPFM helps community to deal with them	Respondents mention some problems, but do not go into any details	Respondents deny any knowledge of problems faced by the community.
Programming	Respondents identify a variety of programming, and have significant local origination; can connect programming to problems faced by community.	Respondents have knowledge of some variety in programming, some of which is of local origination	The programming is one dimensional; few information programs; programs not locally created
Audience Participation	Respondents identify significant audience participation through comments, call-in shows, and contribute to program creation.	Respondents identify some audience participation in call in shows and comments	Respondents attribute no importance to audience participation

Technical information

Out of the seven general interest LPFMs, two LPFM operators claimed they were not funded and were mostly paying for the LPFMs themselves. The other five were funded by audience donations or community organizations. Similarly all of the minority LPFMs were funded by minority organizations, except one. One non-religious minority LPFM operator was

funding the station by herself. Three religious LPFMs were being funded by national network, one by an international organization and the rest were affiliated to the local church.

Table 5-2: Technical information about the LPFM radio stations

	Minority	General interest	Religious
Number of stations interviewed	16	7	7
Average number of years in existence	7 yrs.	6-8 yrs.	5 yrs.
Average number of employees	12-20 volunteers	1 – employee 2-3 volunteers	1 employee/volunteer
Average watt of transmitter	100 watts	100 watts/10 watts 4 LPFMs/3 LPFMs	10 watts (Mostly)
Average status of the interviewee	General Manager	President/ DJ	General Manager

Research Question 1: How do LPFM operators define the communities they serve?

Audience and Goals

The questions discussing the audience and issues facing the community helped in understanding how LPFM operators define the community they serve (i.e. research question 1). The responses to the questions helped in understanding how close to and aware the radio stations were of their community and if they were aware of the information needs of the community. Out of the thirty radio stations' employees and volunteers interviewed, twenty described their community demographics precisely and displayed a thorough knowledge of their target audience. While the respondents who failed to define their community described their audience "as anyone who listens" or "everybody," the LPFMs that defined their audience clearly discussed the

different ethnic groups residing in the locality of the LPFM, and if and what type of race or ethnicity they were planning to target with their radio station. Religious LPFM stations did not describe their target audience precisely, with one religious LPFM from a south-eastern state describing its targeted audience as the “general population”, while another respondent from a minority-religious LPFM describing the community as “people living in the same area and sharing the same values and beliefs.” Another religious LPFM station did not specify any audience, denying any knowledge of the kind of audience that could be listening to them. Twenty three interviewees from all three categories of LPFM station defined their audience in some manner and discussed the diversity in their community’s population, while the other seven LPFMs were vague in describing their audience.

Surprisingly, all the LPFM owners and managers had well-defined goals for their radio station and a very clear idea of the kind of help the station provides to the community. An employee from a minority-religious LPFM from an eastern state described the radio station’s role as “to give a voice to the community” and a way to “get out there and unify the community.” Another southern state LPFM described its goal as an “an outreach”, while a Hispanic LPFM with a religious mission from a western state defined its goal as to “reach the Hispanic community with a positive message”; or to “meet the church members’ need spiritually (as) lots of people here cannot make it out to church for health reasons.” Yet another religious LPFM worker from a southern state explained the radio station’s goal as a platform “for a local presence” and “trying to bring variety of voices in the community.” One minority LPFM owner from a southern state described the radio station as a medium to “inform, educate the community on issues that are relevant to them, entertain the community and maintain the cultural aspects of the community... make sure that the community is well informed and a way to educate the community about the democratic process.” Another minority LPFM general manager from a southern state defined the radio station as “a community radio station... for programming for

inner city of (name removed), that is not provided by the commercial radio.” As compared to minority LPFM licensees, some religious LPFM owners defined the goal of their radio station simply as “Gospel,” or “mainly religious broadcast” without discussing how the radio programming is relevant to or needed by the community.

While two general interest community radio stations defined their goals as “bring dance music to Hawaii” or “give youth a chance to experience the medium”, other general interest operators explained their intentions to provide “interaction with community and give them what they want instead of commercial airing” so that there is a “community feeling to the programs” (Southern State, DJ) , and to try “to bring a variety of voices from the community...giving community programming and educational programming” (Western State, Station Manager) .

Issues facing community

Owners and general managers of religious, minority and general interest LPFMs discussed the problems faced by their respective community in three completely different ways. While four out of the seven religious LPFM stations discussed spiritual vulnerability as one of the main problems faced by the community followed by family relationships and health issues, all the minority LPFM interviewees identified a wider range of problems facing their community such as unemployment, law and order, education, and human rights problems. On the other hand, respondents at general interest community LPFMs identified issues such as economic instability, the housing crisis, environmental issues and unemployment as the main problems encountered by their communities. Moreover, while religious LPFMs agreed that their community must be facing “lots of problems,” two of these LPFMs denied any clear knowledge of these problems, while five respondents gave one word answers. In case of a general interest LPFMs, while six of the LPFMs discussed financial problems, unemployment and health issues as issues faced by the

community, only three provided information to the community that they could use for these problems. Other three LPFMs only provided music and another LPFM general manager from a western state discussed the problems encountered by small impoverished communities by detailing how access to information and knowledge had been limited during the recession because “(t)hey took away the cable access channel and there is no local newspaper. There is a newspaper (in the nearby town) ... most ineffective. There is limited means to communicate with each other in this community,” and added, “(t) his LPFM can fulfill this gap if more community groups get involved.”

Research Question 2: How do LPFM stations operators ascertain, define and participate in the political, linguistic and cultural, social, religious and financial interests of their community?

Public platform for a community

The answers to how they intend to use the radio stations to address the problems faced by the community and what are their plans to effectively use the public platform helped in examining how the LPFM operators understood their communities’ political, linguistic and cultural, social, religious and financial interests and the way they were planning to participate in fulfilling these interests (i.e. research question 2). When asked whether having control over a low power radio station helps in resolving or creating awareness about problems faced by their community, minority LPFM workers expressed optimism. They discussed how LPFMs have been used to “find resolutions and implement them” (General Manager, southern state); are regarded as a “lifeline;” and how, “without their LPFM stations, the community will have no access to

information” (Western state, DJ). They further added that the “commercial radio stations have a systematic culture. Their concentration is more on a larger geographic scale” (General Manager, southern state), while LPFMs are in the “heart of the community and feel the pulse of what community needs are” (Western state, DJ).

Eight minority LPFM personnel have discussed legal problems faced by the community on their radio station and have either discussed legal issues themselves or have invited lawyers into a call in show. A respondent at a southern minority LPFM discussed the democratic process with his community during election time. And yet another minority LPFM from a southern state provided human rights advocacy through the radio station.

On the other hand, five respondents at religious LPFMs showed indecision on whether their LPFMs could help with problems such as unemployment, or financial instability, even though they admitted that these problems are rampant in the community. One interviewee from a western state LPFM station explained that religious LPFMs can help people “emotionally” while they deal with financial problems; while another from a northeastern state discussed how spiritual guidance is equally important while facing financial crises or relationships problems. He added that his radio station brought “hope for a future to live a more meaningful life.” Another north eastern religious LPFM owner suggested that his LPFM created awareness among the people living in a community, but did not mention any programs through which it had created awareness or helped his community other than in the spiritual realm. Another western religious LPFM station general manager said “We try to ... we have some financial programs. We have call in programs. We do have people who talk about economics. We try to help people, give them advice ... what are their main options ... we try to help”. Another religious LPFM general manager from a western state admitted that “I think it helps people, but how many, we don't know. There are 4,600 homes in the area. So I just don't know how many people we are reaching.”

Similarly, the general interest LPFMs too were divided in their opinion on how useful LPFMs can be in addressing the problems faced by the community or catering to the specific needs of the community. One southern general interest LPFM owner agreed that LPFMs can be useful, but not when they are using a 100 watt transmitter, since it does not have the range to address a large enough community. Manager of another general interest LPFM from a western state that mainly aired music programs explained that since they do not have talk shows, their LPFMs did not provide a lot of information, unless there is an emergency. A general interest low power station program director from the same western state explained that since most of the content is created by youth, they have mainly discussed issues such as anti-drug, underage alcohol and antiviolenace issues.

Research question 3: What function do the LPFMs fulfill in their communities through their programming?

LPFM and programming

The questions about how LPFMs owners and general managers described and defined the problems revealed to us how grounded these LPFMs were in the community, whether they were aware of the problems their community faced on a regular basis, and whether in their opinion, their radio stations were addressing these issues through their programming? These questions also examined what LPFM operators envisioned their radio station's role to be in the community they were catering to (i.e. research question three) and if their primary goal was to be an instrument of entertainment, or information, or both? What kind of information was considered important by the LPFM operators and why?

The study revealed that minority LPFMs broadcasted programs in a wide variety of topics and attracted different types of programming from its community. Minority LPFMs, seven of them religious in nature and two with a marked political point of view, described their content as programs that are “helping teens, saving marriages, maintaining families” (minority religious LPFM from a northeastern state), or explaining politics, business or economics. Religious minority community LPFMs (that broadcast religious programs in a minority language or are controlled by a minority community) also aired programs on a wide range of subjects such as law and order, the democratic process, and health and hygiene. One southeastern radio station aired bible teachings as well as programs on “health, education, politics.” An employee from a western Spanish language radio station discussed how they aired 10 hours of talk shows every week that discussed issues such as “education, health, and children” and answered questions such as “How to face discipline problems” or “How to get a job?”

A non-religious minority LPFM from a southeastern state broadcasted programs that “organizes and engages the public” with programs on topics such as “news based on human rights and human rights framework.” Another non-religious minority LPFM from a southern state broadcasted local music such as Zydeco, and aired programs that discussed “health and safety issues, political, and judicial issues.” A respondent at a religious-minority LPFM from a southern state enthused about the potential of LPFMs as “it goes long way toward assisting and creating awareness in the community. We have health programs, educational programs. The community radio station plays a large role in eliminating problems faced by the community. It airs what the community thinks.”

Respondents from general interest LPFMs fell into two categories. Three general interest LPFMs concentrated mainly on music, which is interspersed with public service announcements and snippets of information. The other category of general interest LPFMs, including four respondents, concentrated on creating programs on a range of topics from current events, health

and economics to politics, environment and law and order. They are classified as “comprehensive general interest LPFMs” for the purpose of this study. One general interest LPFM manager from a southern state, belonging to the first category, explained that they do not air any talk shows, but have live emergency updates and do discuss some current events while the music is playing. The LPFM general manager added that the radio station have helped in some community projects in the past such as a fund raiser for LIFE organization. Similarly, another LPFM owner from a western state admitted that his community suffered from problems such as poverty and unemployment, but as his radio station was a small operation, it was unable to address any of these issues. The radio station was focused on music and entertainment and “a lot of it (content) is pre-recorded music.” The radio station aired some public service announcements and “the broadcasters are allowed to comment on current events while the music is being played.”

In the comprehensive general interest LPFMs, a station from a western state broadcasted a variety of programs: music by local artists, five minute long news features and informational talk shows on mental health, women issues, economics, farming, environment, weather changes, labor and media. It had a clear socio-political goal that was evident from programs on the “Occupy” movement and on the effects of corporatized media on the public. Similarly, another LPFM general manager from a southern state explained that the general interest LPFM station had in the past aired political debates and been involved in community affairs programming, depending on who is hosting the show. At the moment, the radio station aired a broad mix of music programming, interviews, local talk shows and syndicated shows like *Democracy Now*. The radio station had also invited alternative healers, aired talk shows about 9/11, discussed conspiracy theories, and held sports talk shows. Some comprehensive general interest LPFMs from this category also attempted to include minority communities in their programming. Four comprehensive general interest LPFMs had aired talk shows, music or cultural programs that were not in the English language. One western state comprehensive general interest LPFM had a

Spanish talk show and had aired Korean language programs in the past, while another LPFM station from a northeastern state aired mostly music programs including Native American Flute, and Latin music in its schedule.

Religious LPFM stations' schedules were focused on religious programs such as speeches by pastors, spiritual discussions and gospel music. Three religious LPFMs also included programs about children, family, and marriage, while the others limited their programming to religion and spirituality. The religious LPFMs, which included programs on topics other than religion, usually discussed issues such as health, family life and relationships in a spiritual context. One religious LPFM from a western state explained that the radio station counseled people on these issues, but spiritually. He explained that "people try and correlate between what is taking place in the world and...(what) the Bible said is going to take place." The president of a religious LPFM from a southeastern state explained that his LPFM rebroadcasts programs received over satellite, and that "there is really no input from here." The programming is mainly Bible and church teachings.

Research Question 4: How, if at all, are the FCC's goals of increasing diversity and encouraging localism being addressed by the general interest, religious and minority LPFMs? How do the three different kinds of LPFMs interpret and implement the goals set by the FCC?

Content creation

Responses to all the questions finally helped to reveal how the three types of LPFMs were interpreting and addressing the policy objectives of encouraging localism - which included involvement of all the sections of community in content creation that is different from programs of mainstream media - and increasing diversity in the media (i.e. research question four). It also

helped in understanding what the three different types of LPFMs understood the principles of localism and diversity differently.

Thirteen out of sixteen minority LPFMs, which were focused on social awareness and used information format, used locally sourced content. One politically conscious mid-western non-religious minority LPFM, however, had not been able to incorporate locally produced programs in its schedule because their content was usually obtained from independent information sources and were about issues such as politics and structural discrimination that could be discussed locally. It mostly made use of material produced by nonprofit organizations such as Democracy Now and Pacifica. This African American non-religious LPFM, with a political agenda, did not air locally produced programs but included the community by inviting them to call in or email the studio.

Of the minority LPFMs interviewed, seven of the eight Spanish language radio stations and one community LPFM had used community produced programs discussing a wide range of issues. A content director of a Spanish radio station from a western state explained that “some of our volunteers (who create programs) are doctors, lawyers and media personalities. We also take interviews of local musicians.” Another content director from a non-religious African American LPFM said that although news was not collected by members of the community, the LPFM was a “conduit for getting the information out there about what’s happening in the community. Where the jobs are? What’s happening in the news? What’s happening in the White House, how does that affect you? We break the news down. We don’t actually do news stories like a news stations, we take the stories in and talk about what it means for the African American community.”

The station manager of one African American LPFM from a southern state explained that “most content is created internally. Part of it comes from the community and part of it comes from volunteers.” But some minority LPFMs failed to include their community in producing their programming, for example a non-religious African American LPFM owner from a mid-eastern

state admitted that only 10 per cent of the aired content was created by the community, while 90 per cent of it came from non-profit organizations. Three LPFMs, which included content created by the community, had only 50 per cent locally produced programming in their schedule.

Five religious LPFMs explained that although sermons were read by the local pastors, they were religious teachings and did not give lay members of the community an opportunity to participate during these programs. Although, these LPFMs allowed community members to call back with their problems during certain talk shows, the feedback they got was infrequent and mostly about religious music. On the other hand, two religious LPFMs procured most of their programming from organizations such as Three Angels Broadcasting Network, or aired gospel music and admitted that they did not receive any comments or feedback from their audiences. One religious LPFM station manager admitted that although there were call in shows, the calls didn't directly come to the studio and were diverted to Illinois where Three Angels Broadcasting Network was headquartered. He agreed that his station's programs were no different from that of any other television or radio station airing religious programs.

General interest LPFMs that mainly aired music did not have locally created programming either. One music LPFM operator said that they allowed "our broadcasters to determine the content of programs. We approve the program ideas. We (have) really not ever denied anybody the opportunity to do a program" (LPFM Worker, western state). However, that station's range of topics was limited to "music programs, a variety of genres." On the other hand, respondent from one comprehensive LPFM that aired mostly political content with some music, advocacy and social commentary programs said that they only included "10 per cent of the content created by the community, 15 per cent of content in terms music. The rest of the station's content came from other radio stations, internet radio..." Another three LPFM workers were trying to include community members in creating content, for example in order to increase

audience' contribution in their content, general interest LPFMs that played music used disc jockeys and musicians from around the town.

LPFMs as a service for minorities

Four respondents at minority LPFM stations agreed that LPFMs had the potential to “give voice to the voiceless,” but suggested that the responsibility to realize this potential lay with station owners. A minority LPFM owner from a northeastern state explained that LPFM service could be used to promote localism and diversity; however the LPFM station was only “as good as its owners.” “When you are sick and tired of commercial media you have a choice, you have a voice; you are a part of media.” Another minority LPFM manager, however, disagreed and said that his radio station did not have the power to affect anyone. He said that “we just keep it open because we have a license. We have 526 sq. miles in the county and 30,000 people live here. It’s a rural county.”

Eleven other minority LPFM personnel had a more positive opinion about the service. A Hispanic radio station manager pointed out that their LPFM station was used in numerous ways in their community, not only to discuss politics and economics, but also as a way to provide information to South American immigrants about their home countries. Another religious minority LPFM owner from the New England region pointed to LPFM’s potential to promote community projects such as food drives, and also to help “the Bible to reach people. Pray for people, if people ask. Air all the teachings in Spanish for people who are not well versed in English.” Yet another minority LPFM owner defined the role of the radio station as an “incubator for spawning new audiences, new leaders who have the opportunity to come in and talk about their goals, agenda.” He pointed out that the LPFMs gave small businesses the opportunity to talk about their business.

On the other hand, respondents from two minority LPFMs expressed disappointment in the LPFM initiative. One LPFM owner from a southern state said that the service could be successful “to a limited degree. Not to a degree that we had initially envisioned... lack of resources stops people from realizing (their LPFM’s) full potential.” Similarly, another LPFM manager from a southern state agreed that LPFMs could be used to bring a voice to the local, minority and marginalized groups but “you have to take into consideration your reach... where people can actually listen to (your LPFM). There are so many outlets for entertainment. You have to be strategic. It’s not intentional, it’s kind of next to impossible to make a program and make it sound good to everyone. Just like commercial stations they divide those stations up... you can’t mix up all those formats.” Another minority station manager explained how LPFMs were different because they were the first non-commercial radio station in the locality and “all the information is new” as compared to commercial radio stations that are like “cookie cutters with the same programs and agendas.”

In general, respondents at religious LPFM stations expressed confidence in the initiative. They believed that although LPFM radio stations had a different format from commercial radio stations, they could be used to empower small communities. However, five of the religious LPFMs were focused on spiritual guidance and did not provide any other kind of information through their radio station. One LPFM owner discussed how the LPFM could be used to air views of marginalized and small communities in the locality. He said that “if the opportunity came to us to do better with the radio station—if a minority group produced a program—we would air that.” However, the manager admitted that the radio station had neither encouraged nor advertised their willingness to air program produced by any groups in the community. He said “we have never thought about that. The main focus of our programming is very limited. It’s a small station. The original founders saw the need for a Christian station and once that was up, they thought they had accomplished it, they were happy.”

He also revealed how LPFMs could fail to fulfill its goals of encouraging minority communities, marginalized and small local groups by explaining how sometimes LPFM licensees focus on just one aspect and fail to realize that a public platform can be used in various ways to empower all the sections of the community. He pointed out that “they were not concerned about community needs, all they wanted was a Christian radio station—they wanted family, financial and children’s programs. The interaction between the radio owners and the community was never established.” Similarly, another religious LPFM from southeastern state agreed that LPFMs can work as public forums, but conceded that they had no plans with their LPFM to encourage marginalized communities.

All the general interest LPFMs agreed that LPFMs were based on a format that would not be successful in the commercial industry. One LPFM manager from a southeastern state commented that “this format does not fly very well in full power radio. This is becoming much more mainstream.” Similarly, another LPFM manager from a southern state agreed that LPFMs could be used to provide a voice to the local, minority and marginalized groups but “(y)ou have to take into consideration your reach. There are so many outlets for entertainment.” She admitted that their LPFM did not have any programs for the minority community and had failed to make the small and marginalized groups heard because there is “not enough coverage. For this market, the LPFM has not helped the minority communities.”

Usually, music and public service announcements were aired on general interest LPFMs, and if socially conscious, LPFM licensees had used the radio station to air alternate points of view and raise questions, discuss civic, political and social events and provide its listeners with “different points of view” for e.g. one of the LPFM owners said “You would hear many, many voices, some of them difficult to understand but they talk about things people need to hear about.” On the whole, most general interest LPFM station owners have agreed that LPFMs have “great potential to serve minority, marginalized and small groups.”

Websites

The third stage of data collection, the review of LPFM websites, was focused on the study of mission statements, program schedules, home pages, and available descriptions of volunteers and employees included in the website, to understand how LPFM station workers define their audience online, and whether they are truly aware of and catering to the diversity in their community.

Three elements of these websites were analyzed: the mission statement, program schedule and the station home pages. This data is collected as a source of additional information, to collect as much information about the LPFMs as possible to understand what role the LPFMs are fulfilling in their community. Studying the LPFM websites helped in getting a more holistic and comprehensive view of how the LPFMs function, interact and participate in the community life, if at all. Studying the websites also helped in understanding how the LPFM operators were using the new media and combining the Internet and the radio station to reach every section of the society.

Twenty two LPFMs - of the thirty stations in the sample - have made use of the Internet to reach a larger audience and to introduce their LPFM station, define their mission statement and program schedules, and provide a live broadcast of their radio shows. Two of the websites were not working during the time this analysis was performed. The websites that were working helped to determine what the LPFM stations' aims and goals are; who their intended audience is and the kind of community projects they are interested in. These websites were also helpful in making contact with the LPFM owners and commenting on the programs aired by the radio station.

Mission Statement

The mission statements were analyzed to understand how LPFMs are presented to the public by the owners, general managers and contributors, and what aspects of the individual LPFMs were promoted in the websites. Out of the 20 LPFMs with working websites, only 16 had displayed their mission statement.

Analysis

A few religious minority LPFMs had included diversity in their mission statement with phrases like “promote world unity” and “provide programming from different countries and cultures.” These religious minority LPFMs included different kinds of programs along with spiritual teachings and gospel music. A religious LPFM station that catered to a community with a large percentage of African American population included links to the local news page and a local business directory on their websites for its audience’ business needs.

Some minorities LPFMs did not post their mission statement or specify their goals. One minority LPFM website stated that their radio station was guided by “Hawaiian culture” and “offering programs and activities to putting a face and a voice on our youth and assisting them in being an important and integral part of the community.” The mission statement went on to describe the various topics that were discussed in their programs including social interaction, economics, ethics, aesthetics, health and wellbeing, science and technology, governance and learning and human development. Another politically and socially active minority LPFM website described its goal to “promote economic, social and cultural consciousness and rights of (the minority community).” It was intended as a “public space” for “developing, testing, training and implementation of approaches to popular education, strategic planning, and communications skill enhancement for self-determination and self-advocacy.” Economic advice was another topic that was popular with non-religious minority radio station websites. In its website, one minority

LPFM described its goal as “a means to provide minority business owners with education on topics important to running a successful business.” In addition, the radio station stated that it aimed to “provide thought provoking topics and exciting music that will be of interest to the entire listening area, with particular focus on those under-served communities within (the MSA area).”

In some non-religious minority LPFMs, efforts had been made to find what its audience really wanted. The importance of connecting with its audience was explained in one mission statement, where a non-religious minority LPFM discussed how they had circulated a survey on the Tribal Governments’ Intranet “to determine station programming. Response to the survey prompted management to add the following music genres: Tejano, Yaqui music (folk and Paskola), Old Skool, Oldies, and Classic Rock” in their programming. This radio station indicated that they had incorporated the suggestions by adding more music genres to the original format. The statement also gave examples of programs that were aired: The Diabetes Program, Club House Radio, the Education Hour, Vahi Vo’om Hiawai (entirely in the Hiaki language), The Sewa Uusim Radio Show, and Tribal Legacies. These programs demonstrated the wide range of topics that the radio station dealt with and the surprising numbers of ways LPFMs addressed various aspects of the lives of its minority audience. Some minority-operated radio stations did not specify the audience they catered to and instead their radio station was “volunteer powered and listener supported radio station – providing the community with views on public affairs, news for small business entrepreneurs, and youth programming” and describes their radio as a “noncommercial, clutter free format.”

One of the general interest LPFM website, which provided both information and music, described the radio station’s mission as “open voice to inform, connect, amplify, and entertain the diverse communities”. It discussed its mission to “voice to members of the community that are not broadcast by mainstream commercial media” (Southern state). While another general interest

LPFM discussed the radio station's history and discussed how their LPFM has "a powerful ability to amplify voices seldom heard" and said that they worked for the "the poor and the marginalized, and we want to be sure their voices are heard" (Southern State). Other general interest LPFMs described their goals in more simpler terms such as "diverse range of music programming selected and created by broadcasters from the (name of the community) and the surrounding region... we also feature public-affairs programming on aging and senior issues, families, history, science and the environment, and other topics" (Western state). Music general interest LPFMs, on the other hand, discussed their mission as "Eclectic blend of recorded and in-studio live music" (Western State).

One religious LPFM discussed that its mission was to "Help People Help Themselves" live a happy and prosperous life" (Southern State), while another religious LPFM discussed its goal to "to present the Gospel of Jesus Christ" (Western state). Another religious LPFM website directed people to the home website of the national network they source their programming from.

Program Schedule

The program schedule was another website element that helped in understanding the goals of a radio station and how they set about achieving it. The program schedule explained how many hours a day or week were spent on information and creating awareness, and how much time on entertainment. In order to fully meet the needs of the community, the LPFMs had to both entertain its audience as well as provide information that would be relevant for the community. This view was supported by mission statements of several LPFMs, which have discussed how the LPFMs were entertaining and helping their community in economics, health, education and social advocacy. Studying the program schedule helped in understanding whether informational programs were aired regularly and constituted a significant share of overall programming.

Analysis

Although most of the programs included in the schedule of religious LPFMs were spiritual, some radio stations had also included health programs. The program schedules of two religious LPFMs supported the responses of the interviewees who claimed that their stations provided information on health and family, as well as spirituality. However, not all of the religious LPFMs included in the study have websites therefore it was impossible to give conclusive analysis of the program schedules of religious LPFMs. Nonetheless, studying some of the religious LPFM stations' program schedules have helped in determining that most of the importance was placed on spirituality, and to a lesser extent on issues of family, children and health, while issues such as law, economy and social advocacy were not debated at all. Furthermore, only two religious LPFMs have clearly included content on other topics as well as religion. Most of the available websites of religious LPFMs either had not posted a program schedule or had not included programs that discussed anything other than bible teachings or gospel music.

The study of program schedules of different general interest LPFMs revealed a difference between radio stations that have a socio-political goal and those that served the entertainment needs of a community. While the program schedule of a general interest LPFM operating in a western island state revealed that the station only focused on dance music, another general interest LPFM had programs such as Democracy Now, The Morning Mayor, The Talking Stick, The Media Geek – clearly aimed to educate the community on a variety of subjects with special emphasis on social advocacy. Yet another general interest LPFM broadcasted programs such as Free Speech Radio News, War News, and *Informative Pacifica* – the latter a Spanish show for the Hispanic audience.

Surprisingly, one general interest LPFM that catered to only the entertainment needs of a community by airing music programs also covered a wide range of other topics. Although the

music was of a wide variety – with jazz, environmental, gospel, reggae, new age, Hawaiian music programs, the LPFM still managed to cover high school and university sports events, health and family issues, personal finance and news on science and technology. On the other hand, another general interest LPFM that aired music programs as well did not allocate time for any informational programs at all. When interviewed, the LPFM's general manager admitted that they only broadcast electronic dance music with some public service announcements in addition to emergency broadcasts when needed.

Among religious minority LPFMs, one radio station did not have any program schedule available on its website and all its sections discussed religious scriptures and no other information was available on any other aspect of the community life. Another minority religious LPFM included programs such as “Something can be done about it” in their daily line up of shows. This 15 minute program addressed issues such as health, education and law and order. One Spanish religious LPFM had a talk show with pastors that allowed the public to call in and discuss any topic. Although the discussions were mostly spiritual, people often discussed their economic and health problems as well.

Non-religious minority LPFMs have programs on a wide variety of subjects – from music to social advocacy. Programs such as “Jazz and Justice” brought the two genres together, while Black Agenda Report and City Moves encouraged political discussion and debate in the community. These LPFMs also addressed the cultural aspects of community, for instance a non-religious minority LPFM aired Zydeco music. The LPFM even influenced local commercial radio to air Zydeco music programs as well. One LPFM discussed money problems with its community in a program called “Dollars and Sense.” Another program that was included in a schedule was “Minding My Business” that aired interviews and gave tips for small business owners. Similarly, another program “What’s going on?” was aired twice a week and discussed local issues, events

and information. This radio station also aired another short news program every hour that broadcasted the news highlights.

Homepage

The projects and events advertised on the home page of the websites revealed the extent to which the LPFM were grounded in the community, and the kind of events and issues they attached themselves to. It also revealed how much the LPFMs included their community in its operations and programs.

Analysis

Religious LPFMs usually provided hyperlinks to internal pages dealing with religious and spiritual issues as well as hyperlinks to other websites that dealt with spirituality, discussed news or advertised local events. For example, one religious LPFM homepage included internal hyperlinks to webpages discussing religious content such as “prophecy update” and “Left Behind,” and links to other websites such as “Christian Clippers” and “Prophecy Depot” and “Embrace God’s Truth.”

The homepage however, also included links to some children’s programming, and links to an independent new network “WorldNetDaily.” Although not all religious LPFMs included in this dissertation have their own websites, the study of existing homepages revealed that the religious LPFMs mainly concentrated their efforts on religion, theology and scriptures, and did not involve themselves with the community. And although a contact number and address was provided, the community projects were not advertised and the radio stations did not address the community directly. Some provided links to news websites but they did not involve themselves in any distribution of information or debate.

Another religious LPFM's website introduced the presenters—all local talent—and described the radio's mission. However, yet again the radio station did not directly address the community. It included internal hyperlinks to webpages: news and events, radio shows, donations, local talent and contact information, but the news and events, and videos webpages did not have any content. The website also included links to websites of inspirational and spiritual books and gospel music.

Websites of general interest LPFMs can be divided into two categories. Some general interest LPFMs aired mostly music, while other general interest LPFMs discussed their goals and aims and directly addressed the community. One LPFM discussed the radio station's history and the latest development in LPFM policy. It included photo gallery of the radio studio and a request for donations. The LPFM contained hyperlinks to webpages that described the local community and also contained links to several other news portals. Another general interest LPFM website provided hyperlinks to its mission statement, broadcast schedule, contact information and a live stream of its programs. The website also asked the community to participate and contribute in the radio studio several times and invited community members to call in during talk shows.

One general interest LPFM introduced all their board members, media committee, fundraising committee, and programming committee through their website. The LPFM included some public service announcements, explained how a person can become a member, presented the program schedule and discussed the organization. The homepage also explained how the radio station works. This radio station clearly wanted to include the community it was addressing in its operations, since having knowledge of board and committee members for the radio station helped the community to know the people who are controlling and managing their LPFM radio station.

Minority LPFM websites can be divided into two categories because religious and non-religious minority LPFMs differed in the way they addressed their audience through their homepages. Much like religious LPFMs, religious minority LPFM stations also concentrated on

religion and spirituality, nevertheless the website also included locally relevant information on their website such as local news, local business directory, invitation to donate, church directory, and live streams of their programming. It informed the local businesses about underwriting opportunities and the community about their on-air personalities.

A Spanish religious LPFM provided access to live programming of other religious radio stations with programming in English. The radio station website included *Youtube* videos of sermons by their pastor; it included links to its social networking accounts on Tangle and Facebook. These accounts included sermons, scriptures and speeches by the resident pastor. Although broadcasting just religious teachings, these accounts were helpful as they gave the audience more ways to access the programming and contact the radio station. Most of the hyperlinks in this website led to more religious literature, except for one, that discussed various health issues. The homepage also had a link to “Events” that advertised the upcoming event in the community. The websites also included information about various churches in California, Texas, and Mexico.

Like the Spanish religious LPFMs, some non-religious minority LPFMs used varied ways to interact with their community. One non-religious minority LPFM installed a webcam – with the help of donors – to keep tabs on the surfing conditions in Maui. Another hyperlink provided a drop down list of various local clubs and cultural hubs in the locality. This LPFM also invited its audience to comment on their new promotional videos. There were other links asking for donations and providing contact information. An African American LPFM had divided its homepage in sections, where upcoming events were advertised and political standpoints discussed. It also had volunteer forms and speaker forms posted on the homepage itself, so that anyone could volunteer - to either work or contribute in the content - directly through the website. The website also included a sale of an artwork created by a local artist to help collect donation for the LPFM.

Similarly, other minority LPFMs posted upcoming events, local and national news on their homepage, discussed the professional achievements of local talent, and put up polls on subjects as trivial as rap music to serious discussions on law and order problems faced by their community, and provided local weather information. Websites of 14 minority LPFMs invited the community to participate in creating the content by either approaching the LPFM staff or through call in talk shows. These LPFMs also discussed the program schedule, listed upcoming events, and introduced the nonprofit organization supporting the radio stations, and its goals. Unlike religious and, to some extent, general interest LPFMs, these radio stations were focused on the community. Minority LPFMs were very involved and constantly interacting with their community through their websites. For example, a Native American LPFM had advertised general elections in the tribal council. They also used the homepage to inform their community of recent developments in the community such as inauguration of a new Justice Center, and New Community Education/Language & Culture Building. The LPFM website also included explanation of the tribal government system, culture and employment opportunities for the tribe members.

Discussion

Audience and goals

Seven LPFMs, by virtue of broadcasting in a specific language, defined their audience linguistically, while other general interest, religious and minority radio stations defined their audience by age group, racial or ethnic identity, or religious orientation. The LPFMs owned by the minority community had a clear idea of the community or audience the radio station was serving and the gap they intended to fill in the lives of their community. Minority LPFM stations

also had a better defined plans with their radio stations and defined their goals to be wide ranging from giving voice to the community to reach an ethnic community with a positive message.

In case of the seven general interest LPFMs, while two radio stations defined their goals as to provide dance music or as a learning instrument, other LPFMs used the radio station as a method to bring different voices in the community platform and provide community programming. Finally, religious LPFMs only focused on religious programming and spiritual development.

The LPFM service was most appreciated in the minority community, as most respondents expressed enthusiasm for the opportunity to reach their community through radio or discussed how the small transmitter size of the radio station service was stopping them from utilizing the radio station to its full potential.

Studying the responses given by LPFM owners and general managers on questions about their audience and the goals of setting up an LPFM station revealed that twelve out of the sixteen minority LPFMs had very clearly stated ambitions and goals for the radio stations that was targeted toward a specific, well defined audience as compared to four general interest and one religious LPFMs. Since most minority LPFM owners, general managers and volunteers were aware of whom they were targeting with their radio stations and were attempting to fulfill what they thought were the needs of the community around them, they were able to clearly define their communities.

Similarly, having knowledge of the community's problems was also another indicator of how well the operators of the three types of LPFMs knew their community and was aware of its information needs. In case of general interest LPFM owners, they either viewed the radio station as a medium for catering to the entertainment needs of the community (3 LPFMs) or a community resource that also extensively broadcast musical programs (3 LPFMs) or a way to distribute information about various serious issues such as politics (1 LPFM).

Public platform for a community

The minority LPFM managers frequently stated that they were able to give information on all community issues on their stations. They stated that LPFMs had been effective in discussing personal finance problems, civic awareness, health issues, savings and budget, and how to deal with economic instability. On the other hand, most respondents at religious LPFMs showed indecision on whether their LPFMs could help with problems such as unemployment, or financial instability, even though they admitted that these problems were rampant in the community. Similarly, the general interest LPFMs too were divided in their opinion on how useful LPFMs can be in addressing the problems faced by the community or catering to the specific needs of the community.

LPFM and programming

As discussed previously, the FCC's goal in establishing LPFM stations was to encourage localism and diversity in the community. The LPFM stations were expected to provide "locally originated programming," such as "forums for news and debate about local issues" (FCC, 2011, p. 32), as well as coverage of local events such as "local school football games, health alerts, school board meetings, local political candidate debates, and independent music" (FCC, 2011, p. 32). Questions about types of programming, community's contribution in creating the content and audience responses to the broadcast programs were asked to determine how much of the programming was created by the community members and how far the community dictated what was aired on the LPFM radio.

The minority LPFMs – both religious and non-religious – have used the LPFMs to broadcast programs in a wide range of subjects. While minority-religious LPFMs have used the radio station to discuss family problems, health problems, and discussing youth problems, non-religious minority LPFMs, especially Spanish language LPFMs, have aired programs that discuss

law and order and discuss news from the country of their origin. The non-religious minority LPFMs also used the radio stations to air programs about public education, human rights programs, local indigenous music, and financial programs.

General interest LPFMs are of two kinds – mainly music and comprehensive. The three music LPFMs mostly provided music with public service announcements and some snippets of information on topics of health and current events. The four comprehensive – music and information – aired programs on topics ranging from gospel, music, political debate, community affairs and financial advice. Religious LPFMs operators reported broadcasting programs on Christian rock, speeches by pastors and sermons. Three out of the seven religious LPFMs also discussed children, family and marital issues. The programming gave an idea on how different LPFMs with different agendas use the public space and how far they made efforts to fulfill the information needs of the community. The minority LPFMs – religious and non-religious – were broadcasting programs corresponding to the perceived needs of the community. Comprehensive general interest LPFMs were also providing programs that gave out information on various topics, while general interest LPFMs that aired only music programs were aware of the problems faced by their community, but did not air programs that would provide the community information on anything except music. Although religious LPFMs concentrated on the spiritual development, they did sometime provide children programming and programs on familial relationships.

Content creation

The FCC, in several documents, encouraged LPFM licensees to include the communities to create content for their radio station. The broadcast of original programming created by the community helped determine if the community had participated in the production of the content. Six of the seven general interest LPFMs and five of the seven non-religious minority LPFMs

included in the study aired programs produced by community members; however six religious LPFMs, because of the nature of their content, did not involve their community in the production of content.

Out of the seven non-religious minority LPFMs, one non-religious minority LPFM did not broadcast locally produced content because the radio station followed a political agenda and sourced its programming from independent information sources, while six of them aired large amount of locally produced programs. Of the sixteen minority LPFMs interviewed, seven of the eight Spanish language radio stations and one community LPFM—part of the Youth center for an ethnic minority—had used community produced programs. The eighth Spanish language radio station, a minority religious LPFM, only broadcast religious programming, although in Spanish and airing call-in shows about family issues. However, an African American non-religious LPFM, with a political agenda, did not air locally produced programs but included the community by inviting them to call in or email the studio. All LPFMs that broadcasted mainly locally produced content either invited the audience to create content on topics the station had chosen beforehand or encouraged people to bring their own programs on any topic of their choosing, and after a simple quality check, they were aired on the radio. This allowed the station to ensure quality control and shape the direction of programming.

Out of the seven religious LPFMs, four were not affiliated to a national religious network. They aired programs that were assembled in the radio station itself, but since the programs were mainly religious music, sermons and theological teachings, the community did not get to contribute or create the content. The other three LPFMs retransmitted the programs aired by the religious networks they belonged to.

Out of the seven general interest LPFMs, three were airing mostly music and therefore did not use locally produced programs, except for using local musicians sometimes. One comprehensive LPFM that was extremely socially aware and active in providing information in

wide range of topics did not include locally produced programming as most of his programs were news bulletins and about social movements from across the country, which did not need community input. Although he did invite feedback from its community, the feedback was rare. The rest three comprehensive general interest LPFMs were actually providing a public platform for their community and reported that a large percentage of their programming was locally produced.

LPFM as a service to minorities

Seven LPFM owners and managers, who were interviewed, had personally participated in the debates about LPFM service in the 1990s and were aware of the reasons why LPFMs were demanded and launched. The opinions of these respondents were mostly positive. There were some concerns raised about how the limited station power of the LPFMs, and elaborate restrictions put in place to protect commercial broadcasts hinders the LPFMs from reaching their full potential, but on the whole, they agreed that this policy was a positive step toward ensuring diversity and pluralism in the broadcasting.

Four respondents at minority LPFM stations agreed that LPFMs had the potential to “give voice to the voiceless,” but suggested that the responsibility to realize this potential lay with station owners. Eleven other minority LPFM personnel had a more positive opinion about the service. Minority LPFMs were mostly positive about LPFM’s potential to make a change in the public debate. They were positive about the initiative, but pointed out that LPFMs reflected its owner’s commitment to policy objectives. If the owner was committed, the LPFMs would be efficient. They discussed how LPFMs were giving opportunity to new people to be leaders, bringing new audiences to interact in a public platform. Only two minority LPFMs out of sixteen said that LPFMs were successful in encouraging diversity and localism but only to a certain degree. Although religious LPFMs operators thought that LPFMs were a positive step toward

encouraging minority voices, they admitted that their radio station had not taken steps to achieve policy objectives of spreading diversity. Similarly, only three general interest LPFMs had tried to supply the information needs of the community they were serving and put forward different points of view.

Websites

The religious minority LPFMs did not clearly specify mission statements in their websites, but studying their websites revealed that these LPFMs catered to a very select, exclusive group of people and did not use the LPFM as a community radio station, but just as a method of bringing together people with similar religious interests for spiritual contemplation. Non-religious minority LPFMs on the other hand discussed the social relevance of LPFMs on their websites, and the history of the LPFM service and the motivation behind it. Non-religious minority LPFMs described their LPFMs as a public space, to give economic advice, further cultural goals, provide advice to local entrepreneurs and provide different kind of music from the mainstream media. Religious minority LPFMs, especially Spanish, reported a wider range of diverse programs than religious LPFMs including health, law and order, and education. Non-religious minority LPFMs had programs on a wide variety of subjects as well – from music to social advocacy. They seemed more focused on social awareness than music and cultural information. Although some LPFMs promoted indigenous music and some Native American LPFMs aired programs promoting their culture such as music and language.

Much like religious LPFMs, religious minority LPFM stations also concentrated on religion and spirituality; nevertheless the websites also discussed local news, provided information about local businesses, introduced its board members and invited the community to donate. Some interactive religious minority LPFMs also took advantage of other social networking sites such as *facebook.com* and *youtube.com* to interact with their community.

Although the messages were spiritual, the LPFMs made more effort to interact with their religious community.

Non-religious minority LPFMs used their websites extensively to involve their audience and community the most. Just like the religious minority LPFMs, non-religious minority LPFMs used various ways to interact with their community. The non-religious minority LPFMs invited audience members to comment on their programming, on the topics they were discussing in their programming. Just like general interest LPFMs, the non-religious minority LPFMs also advertised forthcoming events in the community. Some Native American LPFMs also discussed their general elections and other tribal government activities, which kept the community abreast of all the important official developments.

General interest LPFMs were divide in their goals. Those who provided only music just discussed how they wanted to provide a certain kind of music non-stop to their community. The comprehensive general interest LPFMs were more interested in encouraging community development, highlighting needs of underserved population from local ethnic communities to senior citizens residing in the area. One of the comprehensive general interest LPFM, which discussed the history of its LPFM in the website, discussed the excitement expressed by its community when the radio station was opened. The general interest LPFMs catering to music needs of its community only discussed the kind of music they were going to air through their radio station. Two of the general interest LPFMs broadcasting only musical programs discussed only different kinds of music and musicians in their websites. But, one music general interest LPFM also managed to report other events and activities in its website such as school and university sports events. Similarly although most of the comprehensive general interest LPFMs discussed community events, one comprehensive general interest LPFM did not report any community events.

The general interest LPFMS which aired mostly music were interactive with their community by including live programming and discussing new music talents they were interested in. The LPFMs also introduced their DJs and program directors. There were multiple phone numbers and addresses given. One or two LPFMs even had a live-chat option open to give music lovers a chance to discuss the music. Comprehensive general interest LPFMs were even more interactive, with some LPFMs including photo galleries and the homepage also explaining how the radio station works. They included the community in its operations and provided knowledge of board and committee members for the radio stations in order to introduce the community to the people that were controlling and managing the community LPFM radio station. In some cases, community events were introduced, while others discussed the current events.

The religious LPFMs discussed the spiritual messages they were broadcasting through the radio station. The LPFM websites mainly focused on spiritual development of the community. Similarly in case of program schedules as well, the importance was given to spiritual development. Although some religious LPFMs had a few programs for children and a couple on health programs, most of the program schedule was usually filled with Christian music, speeches by pastors, and theological discussions on religious events such as Rapture.

Out of all the homepages, religious LPFMs had the least busy webpages while the non-religious minority LPFMs and comprehensive general interest LPFMs had the busiest homepages. Just as before, religious LPFMs included hyperlinks to webpages that dealt with spirituality of religious events such as “Left Behind”. Some hyperlinks led to webpages about children’s programming, but they were empty. One religious LPFM website also had hyperlinks to an independent news website. But overall, religious LPFMs discussed and promoted religious messages. Although there were a general contact number and postal address provided, the LPFMs did not introduce their committee members or DJs.

Studying the official documents explained the results the FCC hoped to achieve through its LPFM service. The interviews and LPFM websites revealed how the implementers - the licensees and LPFM workers – understood and interpreted the goals defined by the policy and the individual targets they set up for their radio stations. The analysis also revealed a very obvious difference between how the LPFM stations were used by religious organizations – even those that were controlled by minorities – and non-religious minority LPFMs. Moreover, a difference had been observed between general interest LPFMs that treated their radio station mainly as a source of entertainment and comprehensive general interest LPFMs that used the radio station as a tool to create political, social and economic awareness.

In conclusion, in relation to all research questions, non-religious minority LPFMs and general interest comprehensive LPFMs were able to most clearly define their community and its problems, were most aware of its financial, social, economic, cultural needs, had the most concrete idea, among all the respondents, of its role in the community. They were positive and committed to their perception of localism and diversity and involved the community the most in its content creation. The religious minority LPFMs had a clear idea of their targeted audience and were aware of the community's problems. They produced some programs discussing the issues faced by the community. Although religious minority LPFMs prioritized religious and spiritual development, it was still connected to its community and aware of its information needs. Religious LPFMs and music general interest LPFMs were the least aware of their targeted audience, were unsure of their influence in the community and aired programming on just one or two topics. Although fulfilling an important need, the focus of these LPFMs was narrow and one-sided.

Conclusions

In the year 2000, the Federal Communications Commission (FCC) initiated a new program to license Low Power FM (LPFM) radio broadcasting stations, in an effort to promote localism and encourage minority voices in the public sphere. Thirteen years later, 800 LPFM stations are in operation across the nation, catering to a variety of target audiences including religious groups, linguistic and racial minorities and local communities. This dissertation is an assessment of the implementation of the LPFM program from an interpretivist framework.

Interpretivism, in contrast to positivist approaches, argues that participants in any sort of social activity actively make sense of their experiences based on their personal histories, value systems and individual characteristics. Accordingly, there is not one objective reality out there, but a multiplicity of subjective realities that may differ interpersonally. In terms of policy implementation and evaluation, an interpretivist approach indicates that implementation can present special challenges because policy makers have to rely on heterogeneous stakeholders with diverse interests and perspectives to implement policy. Therefore, attention should be given to the ways in which different stakeholders interpret and apply the policy guidelines produced by a legislator or regulator. In the case of LPFM policy, the success or failure of the policy depends critically on the way in which key LPFM personnel, like owners, managers and DJs interpret the FCC's localism and diversity mandates. Accordingly, a critical part of the policy evaluation process is comprehending how these key stakeholders have understood the FCC's policy goals in LPFM policy.

In view of the above, the introductory chapter identified four research questions for this dissertation. In brief, these were as follows: How do LPFM operators define the communities they serve? How do LPFM station operators ascertain and define the political, linguistic and cultural, social, religious and financial interests of their community? What function do the

LPFMs fulfill in their communities through their programming? And finally, how, if at all, are the FCC's goals of increasing diversity and encouraging localism being addressed by the local, religious and minority LPFMs? Are there differences in the way these three kinds of LPFMs interpret and implement the goals set by the FCC? In sum, the research questions pertained to how the LPFMs defined their audience, and the interests of their community, what function the LPFMs fulfilled in their community, and if and how, the three types of LPFMs differed in interpreting the FCC's policy goals.

To find answers to these questions, this dissertation collected three different sources of data. First, the most significant of the FCC's regulatory documents related to LPFM were chosen and examined, in order to identify the objectives that were set for the LPFM policy. Second, a sample of 30 LPFM stations, including minority-oriented, religious and general interest stations, was chosen using a purposive sampling technique in a manner that also ensured that the population and demographics of their local markets matched. Questionnaire-based telephone interviews were conducted with the owners, managers, and DJs at these stations to discover how they identified their target audience, set their content creation priorities, designed programming line ups, and implemented programs, if they had any, to assess local community needs and respond to them. These interviews were also designed to determine if and how different types of LPFMs (such as minority-oriented and religious broadcasters) differed in terms of their programming, and community outreach strategies. Finally, the available websites of all the LPFMs were examined as a source of additional information to ensure that the respondents have been accurate in describing their content and community service strategies. All available materials such as program schedules, mission statements and websites of the LPFMs included in the study were examined to understand if and how the LPFMs were involved in their community, what kind of topics they covered on their radio station.

The analysis of the interview responses and individual LPFM websites revealed that out of the three categories of LPFMs, only religious LPFMs—mostly non-minority and a few minority—had difficulty in defining their audience exactly. Both general interest and, especially minority LPFMs—all non-religious and most religious—had a clear idea about who they were addressing. The minority LPFM owners were also certain about the role LPFMs, as a public forum, must fulfill in their audience members' lives. The minority LPFM stations were focused on and discussed the way the radio station influenced their community and fulfilled the needs of their community. The religious LPFM stations were not discriminating about their targeted audience. They generally included everyone in the community, but neglected to explain how the radio station was fulfilling the community's needs. Although all the LPFM workers – employees and volunteers – looked at the radio station as a way to reach their community and provide the “voice” of their community, minority community used the low power stations to discuss the social, cultural and even political aspect of their community's life. The religious radio stations mostly limited themselves to the spiritual development of the community, while most general interest LPFMs were inclined toward entertainment, education and health issues.

The three different types of LPFMs perceived the “needs of society” or interests of the community very differently. Minority LPFM stations focused on unemployment, law and order, education, human rights problems, financial stability, unemployment and discrimination. They displayed more confidence in their role in the community. They had a wider range of programming and examined issues ranging from health on one hand to employment, discrimination and politics on the other. Religious LPFMs, on the other hand, discussed spiritual vulnerability and attended to them. Respondents at religious LPFMs either displayed only a vague awareness of their community's problems such as family or health issues or denied knowledge about the community interests and problems completely.

Although some general interest LPFMs were primarily interested in providing entertainment programming, sometimes by local musicians, others had a more balanced program schedule. The LPFMs catering to the general interests of the local community had a range of programming that was narrower than that of the minority LPFMs, but broader than that of the religious LPFMs. General interest LPFM respondents cited economic instability, the housing crisis, environmental issues and unemployment as the main problems encountered by its community, and stated that their station's programming reflected these local priorities. However, although general interest LPFMs did have a wider range of programming, news programming was largely ignored by the general interest LPFM operators. Only one general interest LPFM respondent expressed concern over the lack of feedback between the media and their audience, and said he has attempted to play that role. The general interest LPFM operators do not display similar levels of confidence in their role in the community as their counterparts at minority LPFMs.

Local origination of programming has been one of the objectives of the LPFM policy. The FCC has tried to encourage the local or marginalized communities to produce programs that they would like to listen to on topics they would like to discuss. In case of religious LPFMs, local involvement in production of content is almost non-existent since their programs such as bible songs and bible passages are sourced from spiritual texts. Even when the programs try to discuss issues such as family or health issues faced by their community – like in case of one or two religious LPFMs – the discussion is mainly conducted between spiritual leaders. This format does not require participation from the community. In other religious LPFMs, especially the ones that source their content from big religious networks, even an awareness of local issues is absent.

In case of general interest LPFMs, local program origination has seen indifferent success. Although five, out of seven, general interest LPFMs have encouraged their listeners to produce content, only four have had some success with creating programming locally. In case of minority

LPFMs serving linguistic minorities (including religious minority LPFMs) and non-religious minorities, local program origination is more frequent. However, even among minority LPFMs, one LPFM does not include any significant amount of local programs, as most of its programs are sourced from non-profit organizations on the Internet.

Studying the available websites of most of the LPFMs in the sample tended to support the conclusions drawn from the interview responses. Websites of religious LPFMs do not mention the diversity of their audience or needs of their community very often. Meanwhile, in case of minority LPFMs, there is a divide between religious minority LPFMs and non-religious minority LPFMs. Most religious minority LPFMs did not have clearly specified mission statements on their websites, but studying their websites revealed that these LPFMs catered to a very specific, exclusive group of people; in effect, religious minority LPFM stations did not use the LPFM as a community-oriented radio station, but as a method to bring together people with similar religious interests for spiritual contemplation. Few minority LPFM stations with a religious format showed any interest in discussing current events in a way tailored to their minority community audience. On the other hand, non-religious LPFMs were very socially and politically aware. Many of the respondents at non-religious minority LPFMs discussed low power radio as a real opportunity and recorded the struggle of getting LPFM service as a public forum. Their websites generally showed evidence of being very interactive and inclusive. In case of general interest LPFMs, the homepage and program schedule usually listed entertainment programs and some local events, except for one general interest LPFM that used the website to discuss socio-political topics and various news items.

In summary, the study of the interview responses and websites revealed the role that different types of LPFMs fulfill or intend to fulfill in their community. General interest LPFMs mainly provide entertainment and some discussion on relatively non-controversial issues such as health and personal finances. Almost all of them, except one, avoided news programs and social

debates. Clearly, their self-defined is mainly to entertain and then to create awareness on certain key issues. Ironically, the one general interest LPFM that had the most topical and politically relevant content, was also the most disconnected from its community; it offered very little local programming and its content was mostly sourced from national distributors.

In the case of minority LPFMs, even though there are differences in the type of programming between religious and non-religious minority LPFMs, community identity is clearly articulated by the interviewees and/or prominently identified on websites, indicating socio-cultural awareness. In case of linguistic minority LPFMs, this identity is very easily established by the very fact that the language used for the programming targets one group, while if not explicitly then implicitly, excluding others.

In case of religious LPFMs, none of these factors come into play. Even the most self-critical and engaged interviewee only displayed superficial knowledge of the community his/her station served and seemed vague about the LPFM's role in the community except to provide spiritual comfort, not a small matter certainly, but not really "high local interest" that would require familiarity with the community "to be aware of its special needs." This engagement is further diminished by the lack of involvement by the community in the station's operations. The focus is on spirituality completely, even while they are discussing family relationship issues. Since most religious LPFMs do not either receive or have a process set in place to receive listeners' comments, and since religious LPFMs mostly air Bible music and discuss passages or retransmit content from other religious networks and do not have any programming different from what is already provided by commercial religious networks, the religious LPFMs are not following the spirit of the LPFM policy and have modified the FCC policy objectives to suit their narrow vision.

The possibilities of LPFMs are numerous—it can be made into a platform not only to provide information, but to start community debates, to publicize charity events or school

programs, and be the media hub of a community. Although spiritual development is an important need of the society and individual, providing just spiritual guidance or musical programs no different from the support provided by any other religious media source, is a misuse of such a precious and hard earned resource that have taken so many years to be put in place and could be so advantageous for communities that do not have an outlet or a voice. As witnessed in case of minority and comprehensive general interest LPFMs, this policy has been beneficial for some minority and local communities and it has the capability to help numerous others.

Chapter 6

Recommendation, Limitations and Future Research

This dissertation was intended to examine the implementation of the FCC's low power FM radio policy, as a case study of social policy implementation. However, the success of any policy or program depends on the degree of agreement and compliance policy makers are able to obtain from those who are charged with implementing the policy. Adopting an interpretivist framework, this dissertation examined the ways in which key personnel at LPFM stations interpret and implement the FCC's policy goals. Based on interviews of key personnel, this study found that minority, general interest, and religious LPFMs interpret policy objectives according to what they think is the need of their audience. They do not discuss, reinterpret or focus on issues of encouraging localism and diversity in the community. They interpret the policy objectives according to their agendas and experiences. Therefore, religious LPFMs interpret the need of the community as a need for spiritual development, while minority LPFMs focus on issues of health, law and order, social awareness and finance. While some general interest LPFMs focus on one musical genre only, others discuss a range of topic from social awareness to youth issues.

In this final chapter, the recommendations to policy makers emerging from these findings are discussed. Also, the limitations of the study are discussed, and directions for future research.

Recommendations

The LPFM policy was initiated to bring diversity and localism in the public platform. However, as revealed by the study, LPFMs have interpreted the policy objectives according to

their own agendas and experiences. In order to encourage the LPFM licensees to fulfill the policy objectives, the FCC could make the following changes.

Review license allocation policy

According to the FCC policy, any non-commercial educational organizations could utilize the LPFM service including schools, universities, music groups, religious centers, marginalized groups, local communities, environment groups and civic organizations. The different types of groups eligible for LPFM licenses define the meaning of key terms such as “needs of the community”, “greater diversity of programming” and “highly localized needs” differently. This makes the policy objectives vague for the diverse LPFM licensees to understand. The FCC needs to review the licensing process and fine tune the allocation process so that they are in line with the policy’s objectives. They need to narrow the type of organizations allowed to have LPFM licenses.

Clearly Define Policy Objectives

In case of few LPFMs, the operators admitted that they were not clear about how to use the radio stations. The FCC should clarify and discuss the policy objectives so that the licensees are aware of the potential of the low power radio station. Moreover, the FCC should open more channels of communications and make the process of communication easy so that any LPFM licensees seeking advice and guidance could be provided with the information.

Voluntary Training Programs

In addition, FCC could also organize voluntary training programs for people interested in learning how to operate their radio stations efficiently and to its full potential. They could find industry groups for the training and not get directly involved in the process.

Create Broad Content Categories

Even though, the FCC cannot control what is being broadcasted by LPFM licensees. The FCC can impose broad content categories such as making informational program mandatory. Although, the type of information cannot be controlled, it would help in emphasizing the need to provide information. Similarly, the FCC's "eight hours per day of locally originated programming" rule that it already takes into consideration when selecting among mutually exclusive applications, can be imposed as a rule for all licensees. This would ensure that at least eight hours of programming is being created by the community on topics they are eager to discuss.

Limitation and Future Research

This study has several limitations. First, it cannot determine the relevance of included LPFMs in their community as the study did not include interviews of the audience members the LPFMs were catering to. Because this study was an examination of how policy is interpreted by its key stakeholders, it could not stray into the field of audience research. Moreover, since the sample was from across the country, collecting information from the audience members would have been difficult. However, this would be a relevant topic for future research as it will reveal how different types of low power radios contribute to the community it is serving. If these low power radio stations are fulfilling what the community thinks is their information need. It will also help in understanding how the policy is working in the real world and if it is actually achieving its policy goals and fulfilling the "highly localized needs" of a community.

Another weakness of the study is that although the data is collected through interviews and websites, both the sources are self-reported and cannot be trusted to provide accurate

information. Therefore, the researcher cannot judge what types of programs are actually being aired by interviewing the operators and checking program schedule. The interviewee may have exaggerated the frequency or diversity of programs. They could also be exaggerating the percentage of locally produced programs that is being aired through the radio station. Similarly, websites are unreliable source to accurately report schedules or programs. The schedules may not have been updated or may just not be followed. The schedules may be another way of “self-presentation”. As a future research, an ethnographic study could be conducted on how a LPFM that has succeeded in providing diverse programming to its community conducts its operations and how it determines what the needs of the community are. How do they involve all sections of the community? How do they encourage the community to participate and how do they impose quality control of the locally produced programming? What kind of feedback is received and incorporated in the programs? It will help in understanding if the audience – the community – has an opinion about the LPFM service. This research would explore how a fully functional LPFM, working to its full potential is utilizing the resource and how is it prioritizing the information needs of its community.

Another weakness of the study is the sample only includes LPFMs that are willing to respond to interview requests and participate in the study. This leads to systematic error as only some people who already are confident in their manner of operating the LPFMs have provided the data. This design flaw leads to a bias where the compliance reported is actually exaggerated since the LPFMs that were aware of not been compliant or functioning did not respond to the interview request. Hence, the results only represent the LPFMs - of all the three categories – that are most active and have a clearer mandate with their radio stations. This is a problem that can be faced by studies that have a small sample size, include human subjects and collect data through telephone interviews. As a future research, an interpretive analysis of just one category of LPFMs could be conducted to determine a general pattern of programming and motivation behind it. It

would help in understanding how a particular kind of agenda influences the program line up of LPFMs and could result in revealing a method of providing a more balanced content.

Finally, although the non-commercial aspect of LPFMs have been often debated among scholars. It would be an interesting academic exercise to explore and examine whether and how the non-commercial characteristic of LPFMs are hindering and/or supporting the successful achievement of LPFM policy objectives.

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Appendix A

Information about LPFM interviews

Number of radio station approached for interview	80
Number of interviews	30
Number of religious LPFMs	7
Number of local LPFMs	7
Number of minority	16
Number of non-religious minority	7
Number of religious minority	9
Number of General Managers/CEO/President	12
Number of other Officers (Director/Assistant/DJs/Lawyers)	8
Number of Volunteers	10
Total interview time	917.41 minutes (15.29 hours)
Shortest Interview duration	13 minutes
Longest Interview Duration	65 minutes

Appendix B

LPFM documents consulted for Analysis

Name of the Document	Adopted/Released
<i>Notice of Proposed Rulemaking</i>	January 28, 1999
<i>Report and Order</i>	January 27, 2000
<i>Memorandum Opinion and Order on Reconsideration</i>	September 2000
<i>Second Report and Order</i>	Adopted: March 22, 2001/ Released: April 2, 2001
<i>Greg Ruggiero Vs FCC</i>	Argued Sept. 6, 2001/ Decided Feb. 8, 2002
<i>Second Order on Reconsideration and Further Notice of Proposed Rulemaking</i>	Adopted: March 16, 2005/Released March 17, 2005
<i>Third Report and Order and Second Further Notice of Rulemaking</i>	Adopted Nov. 27, 2007/ Released Dec. 11, 2007
<i>Third Further Notice of Rulemaking</i>	July 12, 2011
<i>Fourth Report and Order and Third Order of Reconsideration</i>	March 19, 2012
<i>Fifth Report and Order</i>	Adopted/Released March 2012

Appendix C

List of references to localism and diversity goals in LPFM documents

Documents	Report and Order	Memorandum Opinion and Order on Reconsideration	Second Report and Order	Greg Ruggiero Vs FCC	Second Order on Reconsideration and Further Notice of Proposed Rulemaking	Third Report and Order and Second Further Notice of Rulemaking	Third Further Notice of Rulemaking	Fourth Report and Order and Third Order of Reconsideration	Fifth Report and Order	Summary
Date of Release	Adpt January 20, 2000/Rlsd January 27, 2000	September 2000	Rlsd: April 2, 2001/Adptd: March 22, 2001	Argued Sept 6, 2001/ Decided Feb 8, 2002	Rlsd March 17, 2005/ Adptd: March 16, 2005	Adpt Nov. 27, 2007/ Rlsd Dec. 11, 2007	July 12, 2011	March 19, 2012	Adpt/Rlsd March 2012	
Classes of service	“(F)ocusing on local needs” (p. 6, para. 9) “(F)or school campuses and local community organizations” “best option for crowded urban area” (p. 6, para. 10)	“complementary way to serve the needs of communities” (p. 26, para 63) - “demonstrable demand” for locally based programming (p. 26, para 63)		- “Low cost means of serving” both urban and rural areas (p.2).			LCRA, Jan. 2011 “based on the needs of the local community” (p. 4, para. 5)			*local needs *serve the needs of the community *for local community organizations and in urban and rural areas. *Locally based programming.
Ownership	Noncommercial educational basis * “entities that do not hold an attributable interest in any other broadcast station” (p.2, para. 1) *Only local entities eligible for LPFMs for the						Ownership restrictions - ownership diversity in community of license. (p. 8, para. 17) *“meet the needs and interests of their			* Non commercial *Ownership diversity * meet the needs and interest of the communities

	first year. (p.2, para. 1)						communities.” (p.8, para. 17)			
Cross ownership	-“afford small, community-based organizations an opportunity to communicate over the airwaves” and “expand diversity of ownership”. (p. 13, para. 29)	- “diversity of ownership”. -“new voices to the airwaves” (p. 31, para 76) - opportunities to a wide variety of groups				Protect the public interest in localism and foster greater diversity of programming from community sources. (p.11, para. 23)			* They will enhance the “ability of Native Nations to provide communications services to their members on tribal lands (p.23, para. 57)	*small community based organizations *Expand diversity of ownership Protect public interest, localism, and diversity of programming.
Community based & Local ownership	-Fulfill “highly local interests” not “being met by full-power stations” (p. 15, para. 33) * Particular needs and interests of these small areas. (p. 15, para. 33) *“An applicant familiar with the community likely to be aware of its special needs. (p. 16, para. 34)					*Removing the “locality restrictions could threaten its local character. (p. 11, para. 24) * “we view local origination as a central virtue of the LPFM service.” (p. 11, para. 24)	“There is a need for greater numbers of LPFM stations in larger, more densely populated markets. (p. 11, para. 25)			*Highly local interests. *Needs and interests of small areas. *applicant familiar with the community and aware of its special needs. * LPFM represent local character. * Local origination.
Local ownership limits	“(p)otential for diminution of diversity in ownership if one entity is allowed to control more than one station in the locality. (p. 18, para. 44)								“local entities with their roots in the community will be more attuned and responsive to the needs of that community” (p.	* Diversity in public platforms in community *Local entities with their roots in the community.

									21, para 53)	
Mutually Exclusive application	Established community presence -Proposed operating hours, -Local program origination (P. 54, para. 136)									*Established community presence, local origination and fixed operating hours preferred.
Transferability	"goal is to foster opportunities for new radio ownership and diversity". (p. 64, para. 163)				Some level of flexibility will help such as waiver may be appropriate, assuming the public interest would be served. (p. 10, para.. 20)	"Permitting assignments or transfers to allow newly "merged" local entities to pool resources to provide quality local content. (p. 9, para. 17)				*Foster new opportunities, and diversity. Public interest needs to be served.
Goal	*"encouraging diverse voices on the nation's airwaves(p.8, para. 15) "grounded in their local communities." (p.4, para. 3) -"to create a class of radio station designed to serve very localized communities or underrepresented groups within communities" (p.4, para. 4) *Benefit listeners in low income, minority communities as well as the						Needs of communities for additional LPFM service and provide meaningful local service in larger markets. (p. 7, para 14)			* Diverse voices Grounded in the local communities. Platform for local groups, schools churches etc. *To serve very localized communities and under-represented groups. *Benefit listeners from low income minority community. *Reaching underserved groups. * Provide a key source of news and information * Provide

	listening public.									meaningful local service in larger markets.
Locally Originated Programming	FCC has not imposed "specific requirements for locally originated programming on LPFM licensees" (p. 68, para. 171) * "ensure that LPFM licensees will meet the needs and interests of their communities" (p. 65, para. 166)	A LPFM licensee can air programs about events taking place outside of the ten miles if "the production involves facilities located within a 10-mile radius of the antenna". (p. 39, para 98)			"Should all LPFM applications have primary status because LPFM stations are permitted to originate local programming?" (P. 16, para. 33)	* "repetitious automated programming does not meet the local origination requirement". (p. 12, para 24)	Most translators do not originate content (p. 7, para 15) and they are not required to air programs that provide significant treatment of community issues. (p. 7, para 15)	LPFMs "are uniquely positioned to meet local needs, particularly in areas of higher population density". (p. 10, para. 18)	"applicant's intent to provide locally-originated programming is a reasonable gauge of whether the LPFM station will function as an outlet for community self-expression." (23, para. 63)	*Origination of content. *Locally originated programming is preferred, but not mandatory.
Nature of Service	"linguistic and cultural minorities or groups with shared civic or educational interests that may now be underserved by commercial radio and higher powered noncommercial radio stations" (p. 9, para 17)	- Consolidation of radio station ownership in recent years, the need for adding diverse voices to the airwaves has grown. (p. 30, para 71)								*Diverse voices in the air such as linguistic and cultural minorities.
Programming	Instructional programs, students programming, bible study, cultural content,	Need not be "exclusively educational for an entity to qualify as an (non -								* Instructional programs, students programming, bible study, cultural content,

	in-depth news coverage, and children's programs" (p.10, para. 20).	commercial Educational) NCE entity eligible for non-commercial licenses". (p. 30, para 74)								in-depth news coverage, and children's programs
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Appendix D

Questionnaire for LPFM stations

Low power radio assessment

Station interview schedule

Date:

Introduction

Hi, my name is _____. I am a student at Penn State University, working on an assessment of low power radio stations throughout the United States. I want to start by thanking you for agreeing to speak with me today about your low power radio station. These questions should take no more than 25 minutes to answer. I'd like to record this interview so that it can be transcribed and evaluated later. Is it okay if I record?

General questions

What is your name?

What station are you affiliated with?

Where is it located?

What is your job or title there?

When did you first hear about low power FM radio?

How long has the station been operating?

How big is the staff of your station?

Are they paid staffers, or volunteers, or a mix of both?

How many Kilowatts is the transmitter you use?

How far away can your station be heard?

Questions addressed to LPFM station owners

What is the goal for setting up the Low Power FM station?

How do you define your audience/community?

How is the LPFM station funded?

Are there any problems facing your community today?

If yes, what are the problems faced by your community today?

Do you think having control of a public platform such as LPFM helps in resolving the issues faced by your community?

Do you directly address these issues in your LPFM?

If yes, what are the issues that are addressed by the LPFM address? How?

Are you (owner) involved with the day-to-day running of the LPFM?

If you are involved, do you a) decide the content of the programs; b) design the schedule, c) manage the donations, d) manage the feedbacks from the community?

What kinds of programs do you broadcast in the LPFM?

Does your programming concentrate mainly on music and entertainment?

Do you air mainly informational programs; or do you broadcast amalgamation of programs that include both entertainment or informational programs?

Are there any programs encouraging discussions on the current events and how it affects the community?

Do you get feedback from your audience?

If yes, what kind of feedback do you get?

Do you encourage audience participation?

If yes, what kinds of programs allow audience participation?

What medium is used to facilitate audience participation (through emails, through phone calls or by inviting audience members to a program)?

How many people work in the Low Power FM stations?

How many of the workers are employed and how many of them are volunteers?

Do you employ members of the community?

If yes, is LPFM contributing in providing financial opportunities to some of members of the community?

How do you see the LPFM develop in future?

What are your future plans of LPFM?

The LPFMs was initiated to encourage diversity and local voices in the public platform, do you think it has?

If no, why?

If yes, how?

Questions to LPFM General Manager

What are the issues facing your community today?

How can actual issues faced by the community translated into programs that will both inform and entertain the community?

What is the structure of the programming schedule – how much time is spent on airing music programs?

What kind of music do you air?

Are the music aired in the show promoting local music or musicians?

How much time is spent on providing news and do these news telecast are specially designed to inform the community on the issues that are important for them?

How much of the content is created by the community and where does the rest of the content come from – mainstream media, the Internet, other media such as newspapers, magazines?

How do you record feedback and incorporate it?

What kind of feedbacks are generally received –

Are they responses to or commentary on social, political, economic issues? Are they culture specific comments?

How different are these programs from content in mainstream media? For example: Format, natures of music, the DJs are from your community, religion discussed in a different manner (more personal)?

Do these programs reach communities other than their own? And if yes, how are these programs designed to demystify their community and increase understanding?

How is the schedule designed so that it appeals to both elderly members of the community and the younger generation?

What is done to ensure that every section of the community within the range of the radio stations can participate in the programming?

Questions for the DJ

What function does the LPFM have in your community?

Do you have radio programs that encourage dialogue in the community?

Is your content different from that of mainstream media?

What kinds of programs are different from the mainstream media?

Who selects the content for broadcasting?

Do you provide entertainment, information or balance of the two? How do you present the content?

What is the format? How is it different from the mainstream radio programs?

Is the target of your LPFM to promote a platform for serious discussion and information?

How does the radio station include the community?

How does having a LPFM help the community besides providing entertainment/education? Does it help promoting small businesses, advertising church festivities, inform about problems faced by individual households, or collect donations for some community project?

How are the feedbacks incorporated in the programs? How far is the audience allowed to contribute in the programming and daily running of the show?

What are the future plans with the LPFM? What else do you hope to achieve through these stations?

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Education

- Ph.D. Mass Communications, 2013
The Pennsylvania State University.
- M.A. (English Literature): Department of English, Lady Shri Ram College,
Delhi University, India.
- M.A. Diploma (English Journalism): Indian Institute of Mass Communication,
New Delhi.
- M.A. Diploma (English Journalism): Bharatiya Vidya Bhavan, New Delhi
- B.A. (Honors) (English Literature): Gargi College, Delhi University, India.

Conference Presentations

- Chatterjee, N. (2011) Media Framing & Terrorism: Analysis of frames in news reports of London bombings & Mumbai attacks. Paper Presented in AEJMC Conference 2011
- Chatterjee, N. (2009). New Media and Community Identity: The Role of the Internet in Forming Immigrant Transnational Groups. Paper presented in the Global Fusion 2009.
- Kang, H., Kim, H., Bae, K. & Chatterjee, N (2008). *Only for you! An Investigation of Tailored Services' Effect on Users' Attitudes and Gratification*. Paper presented in the Communication and Technology Division of 2008 AEJMC Mid-Winter Conference.
- Kang, H., Kim, H., Bae, K. & Chatterjee, N (2008). Only for you! An Investigation of Tailored Services' Effect on Users' Attitudes and Gratification. Paper included in the Annual AEJMC Conference in 2009.
- Kang, H., Kim, H., Bae, K. & Chatterjee, N (2008). Only for you! An Investigation of Tailored Services' Effect on Users' Attitudes and Gratification. Paper presented in the 2008 IST Graduate Symposium.
- Kang, H., Kim, H., Bae, K. & Chatterjee, N (2008). Only for you! An Investigation of Tailored Services' Effect on Users' Attitudes and Gratification. Poster presented in the 2008 Graduate School Poster Presentation.