

**WRITERS  
GUILD  
of AMERICA  
EAST**

October 6, 2010

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Lowell Peterson  
Executive Director

Ruth Gallo  
Assistant Executive Director

Marsha Seeman  
Assistant Executive Director

250 Hudson Street  
New York, NY 10013

T: 212-767-7800  
F: 212-582-1909  
www.wgaeast.org

The Honorable Julius Genachowski  
Chair  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Merger of Comcast and NBCU; impact on news and public affairs programming

Dear Honorable Genachowski:

The Writers Guild of America East represents thousands of members in film, television, radio, and digital media. Many of them work in news and public affairs for the major television and radio networks and stations and for public television. They write scripts, produce, edit, and create graphics, material that is broadcast over the airwaves, distributed on cable television, and posted on the Internet.

The proposed merger between Comcast and NBC/Universal would further consolidate the production and distribution of news and public affairs programming relied upon by the American public and essential to the proper functioning of a representative democracy. But fewer and fewer entities creating news and public affairs programming for broadcast or cable television or for the Internet means less diversity of news content. By definition, fewer points of view are presented, fewer stories are reported in-depth and fewer resources are utilized to pursue them. True investigative reporting has almost vanished completely from commercial on-air news or has often been reduced to sensationalized, trivial coverage of no lasting significance. Instead of a town square where ideas flow freely, the news business becomes more like a shopping mall dominated by a small number of megastores. This thwarts the public's ability to engage in robust, well-informed discussion of the critical issues of our times.


One way to counteract this trend would be a significant increase in public funding of public affairs programming on public television. This approach would recognize the economic pressures placed on all news-gathering organizations by declining advertising revenues, and it would permit content creators greater latitude to pursue stories for their intrinsic news value rather than their perceived ability to grab eyeballs and drive profit margins. This concept – more public funding for news and public affairs programming – might seem tangential to a review of a proposed merger, but we respectfully suggest that if media conglomerates insist on being permitted to consolidate their hold on the media marketplace, in exchange they can be required to contribute assets to public programming. This was the tradition upon which quality

American broadcasting originally was founded – the networks and stations understood their responsibility to the public -- and would counterbalance the tendency of consolidation to deprive the American people of diverse content and high-quality news and public affairs shows.

This is particularly true in the case of the Comcast/NBCU merger, because it would result in a single company producing content and acting as sole distributor of that content – both on cable and online – for tens of millions of Americans. This new, mega-company would have enormous power over what people watch and a clear economic incentive to direct its customers to the content it produces. It is imperative that this further consolidation of control be counterbalanced by a commitment to broaden the programming available to the public.

If the merger is approved -- and we hope it is not -- we respectfully request that the FCC, the Department of Justice, and the Judiciary Committee require the merged company to contribute significant resources to the production of truly independent content. Although we are also deeply concerned that the merger will limit the ability of independent producers of entertainment programming to reach their audiences, the effect will be particularly profound in the area of news and public affairs programming. Therefore, we suggest that the merged company be required to set aside at least \$10 million per year for ten years for the creation of thoughtful, independent, well-researched public affairs programs for television and the internet. We further suggest that this funding be allocated in the same manner as public television funding – either through the Corporation for Public Broadcasting or another entity to be established for this purpose.

Best regards and in solidarity,



Michael Winship  
President



Lowell Peterson  
Executive Director