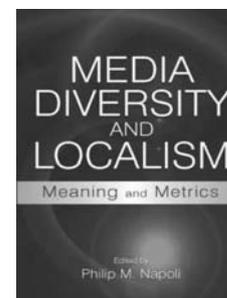


NAPOLI, P. M. (ed.) *Media Diversity and Localism: Meaning and Metrics*.  
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### A challenge of complexity: how to regulate media diversity without simplistic reduction

At a normative level, media diversity has long been perceived as a valuable concept in media policy studies and practice, both in terms of its importance for the democratic process as well as for the harmonious formation of cultural identity in increasingly differentiated societies. At the same time, the complexity and generality of media diversity has resulted in a wide range of interpretations and has generated a fertile ground for discursive tension and negotiations about the usage of the concept itself in media policy. Philip Napoli and his colleagues have captured the imagination of many scholars and policymakers in this collective volume, outlining an alternative way of analysing media diversity through empirical assessment and well-focused metrics. The analytical programme proposed derives from US media policy and judicial practice, exposing empirical evidence as a necessity that should support any vital and effective policies targeted at preserving diversity.

Napoli's academic background spans media economics and policy analysis. As an author of two books (Napoli 2003; Napoli 2001) and numerous publications devoted to communications policy, the regulation of electronic media and audience economics, Napoli has inspired European scholars to reflect upon policy analysis from the perspective of empirically grounded research.

### Diversity and localism: a problem of distinction

One of the biggest challenges exposed in this collective volume seems to be a dilemma, namely whether sound empirical assessment can be accomplished without simplistic reduction, ultimately undermining the role of media diversity. A perspective seen through 'the metrics lens', as proposed by Napoli and his colleagues, concentrates on questions of media structure/ownership, their relationship to media content and the principle of localism in its broad sense. Are diversity and localism two different sides of the same coin, as suggested in the title, or is one of them (localism) rather a dimension of the

other broader, more generalized concept (diversity), which serves to cover a rich and multi-dimensional field of external and internal media structures? Although, for analytical and theoretical purposes, the latter option seems more logical, the volume follows two separate routes, paying attention to two different principles – diversity and localism, inspired to a great extent by US legal and policy practice.

### Diverse ownership and content: an imagined link?

An explanation of structural dimensions (media ownership) in the first part of the book mirrors the logic of the US approach to the regulation of media diversity largely conditioned by the First Amendment and thus also focuses on the 'diversity of voices' rather than 'content'. Joel Waldfogel (*Should We Regulate Media Ownership?* p. 3-8) provides a critical account of linking antitrust regulation (based on the Herfindahl-Hirschmann Index, HHI) with media ownership regulation. In a similar vein, Robert Horwitz (*On Media Concentration and the Diversity Question*, p. 9-56) argues that changing patterns in technology and media use complicate the traditional geographic and product market distinctions pivotal to antitrust analysis. Waldfogel's and Horwitz's chapters also pose fundamental questions testing the media diversity rationale itself: what aspects of public interest are affected by the media? Is there any evidence that ownership affects these? Can ownership rules, concentration limits and minority licensing preferences actually bring about the desired changes in media content? A short analysis of the evidence used in legal practice shows that the alleged connection between diverse ownership and diverse content has been generally weak (Horwitz, p. 40).

### Employment and news

In addition to external diversity or structural dimensions, the volume also tests other important aspects of diversity relatively neglected in US policy practice and implementation. Peter DiCola (*Employment and Wage Effects of Radio Consolidation*, p. 57-78) focuses on the relationship between employment, market consolidation and localism. He demonstrates

that more consolidated markets result in job reductions and therefore also in the decreasing impact of local residents on decisions about available content (DiCola, p. 62). Peter Alexander and Brendan Cunningham (*Public and Private Decision Making: The Value of Diversity in News*, p. 79-96) deem content, and in particular the news, to be the most important indicator of diversity. They assume that consumer utility is determined by the quality, consistency and variety of output provided by broadcast news media. The empirical evidence they assemble suggests that more concentrated media markets exhibit more homogeneity in the information conveyed to consumers.

### Conceptual and methodological reflections

Different methodological and conceptual windows serve another group of authors to deconstruct and reconstruct the concept of diversity vis-à-vis new policy demands. Stefaan G. Verhulst (*Mediation, Mediators, and New Intermediaries: Implications for the Design of New Communications Policies*, p. 113-137) paints a new conceptual approach based on 'mediation'. He argues that 'mediation' should be used as an analytical tool to better understand how to adapt our current communications policy toolbox and principles to new circumstances, and how regulations, for example those applied to broadcasters, can be 'translated' to the internet. Sandra Braman (*The Limits of Diversity*, p. 139-150) reflects on the limits of diversity. One of the most salient questions would be whether there is meaningful content diversity if people receive information but cannot make a sense of it. In other words: is diversity of information meaningful if it cannot be connected with democratic deliberation, political behaviour or decision-making? Steven S. Wildman (*Indexing Diversity*, p. 151-176) provides a critical account of a Diversity Index (DI) introduced by the FCC (Federal Communication Commission) to assess the effect of ownership structure on the performance of local media markets. Wildman argues that, after the Third Circuit Court of Appeal's decision, the Index has been plagued by problems of both internal consistency and external validity, mainly because its theoretical component has been neglected. Stephen D. McDowell and Jenghoon Lee (*Tracking 'Localism' in Television Broadcasting: Utilizing and Structuring Public Information*, p. 177-191) focus on an idea of localism in television broadcasting. They promote methodologies that include a number of dimensions, extending localism beyond programming and content. Mark Cooper's (*When Law and Social Science Go Hand in Glove: Usage and Importance of Local and National News Sources – Critical Questions and Answers for Media Market Analysis*, p. 193-224) essential contribution discusses methodological and theoretical issues that provide a critical account of the usage of the Diversity Index in US policy implementation. Cooper in particular examines a crucial element of the DI, the primary source of information in the case of local and national news. Cooper follows the FCC's general approach to geographic market definition and presents originally generat-

ed data on national and local news sources. The results confirm that the FCC's Diversity Index underestimates the importance of newspapers and overestimates the importance of radio and the internet (Cooper, p. 214). In conclusion, Cooper stresses that social science analysis has great potential to provide valuable data for well-directed diversity policy.

### Minorities, media and diversity

Relations between minorities, media and diversity have long been recognized in US media diversity policy. Although policy implementation revolved mainly around questions of minority ownership, authors in this part of the volume discuss content and media portrayal as well. Leonard Baynes (*White Out: The Absence and Stereotyping of People of Color by the Broadcast Networks in Prime Time Entertainment Programming*, p. 227-267) emphasizes the importance of policies that support the fair coverage of minorities. He proposes an 'ordinary viewer test' to detect discrimination by absence or discrimination by stereotyping. Christine Bachen et al. (*Serving the Public Interest: Broadcast News, Public Affairs Programming, and the Case for Minority Ownership*, p. 269-306) analyse minority ownership from the perspective of US government policy. The chapter provides an overview of policy history, starting from the FCC's Kerner Report (1967), following the FCC's efforts to map the media representation of minority views and minority-aware policies to promote minority ownership. Authors conclude that minority-owned media generally pay greater attention to ethnic and minority audiences' needs and interests (Bachen et al. p. 293).

### Audience behaviour and new technologies

Finally, the last part of the book sheds new light on media diversity from the perspective of users and new media services. James Webster (*Diversity of Exposure*, p. 309-325) builds on the concept of the three component parts of diversity proposed by Napoli: source, content and exposure. Webster argues that, although there was quite an extensive focus on first two types of diversity in research and policy-making, the latter has been largely neglected. Webster analyses three potential units for an exposure analysis: viewer-centric measures, content-centric measures and channel-centric measures. Matthew Hindman (*A Mile Wide and Inch Deep: Measuring Media Diversity Online and Offline*, p. 327-347) compares a series of nationwide data sets on audience concentration within various forms of media. He demonstrates that across all different metrics, internet content produces higher levels of audience concentration than those in traditional media (Hindman, p. 329). Eszter Hargitai (*Content Diversity Online: Myth or Reality?* p. 349-362) analyses people's online information-seeking behaviour, collecting the data through observations and interviews. The empirical data prove that the mere presence of content diversity online does not guarantee its ease of access. Therefore, it's important to make the distinction between available and accessible content (Hargitai, p. 361). Ellen P.

Goodman (*Proactive Media Policy in an Age of Content Abundance*, p. 363-382) distinguishes between reactive and proactive policy goals, the latter understood as increasing content exposure. She offers a critique of the Diversity Index, arguing that the availability of diverse viewpoints, for example on cable channels, is of limited value if citizens are not actually exposed to these viewpoints (Goodman, p. 369). Goodman supports heavier reliance on subsidies as opposed to regulation, and not just for public broadcasting but also for non-commercial content delivered on all digital platforms.

Philip M. Napoli's collective volume signals the need for a multilateral approach: the appropriate meaning of both diversity and localism, as well as their application in communications policymaking, require a far-reaching dialogue across various disciplines. The broad array of perspectives brought together in the book unites in one conclusion: the principles of diversity and localism should be pertinent.

## References

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