Media Monitoring in the U.S.: A Matter of FAIRness

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Corporate Social Responsibility (IRGN 423)

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Introduction

Imagine there is a terrible accident at Disneyland: The Matterhorn roller coaster suddenly lurches off the tracks mid-ride, sending children, parents, and Mickey Mouse hats flying. Now, consider the sensational media coverage that follows. Journalists and news crews fall over themselves to get the scoop on this uniquely American tragedy, staking out the hospital and trying to get exclusive interviews with survivors. But how would ABC News, whose parent company is the Disney corporation, handle the story? Would ABC reporters be discouraged from providing a full account of the incident? Would they be punished for attempting to expose the maintenance failures that caused the accident? Or would Disney use its parent-company status to demand favorable, public-relations-approved coverage from ABC News? Thankfully, this was just a hypothetical situation. The issues it raises about corporate social responsibility in the media, however, are serious enough to merit closer examination.

CSR in the realm of mass media is a little-explored and poorly documented field. This should be somewhat surprising given the prevalence of media in our lives. Consider the thousands, perhaps millions of information portals that exist via the Internet, television, radio, newspapers, and magazines. Behind every article and news item that is published, aired, or uploaded there exists a corporate structure—a multinational corporation, a team of editors, a publishing house—that acts as a gatekeeper for information, releasing or restraining content to carefully targeted audiences.

In the United States, freedom of expression is enshrined in the Bill of Rights of the Constitution—our sacred governing document. As such, one would expect a variety of media evaluation mechanisms to contribute constructively to a national dialogue on the responsibilities, successes, and shortcomings of our media landscape. Yet such a national dialogue barely exists, let alone with the active participation of organizations whose sole job is to critique content. Media monitoring organizations are a rare bird, operating in virtual anonymity except among conscientious citizens who take the time to think about what they're watching or reading.

The opaqueness of mass-media content production raises a variety of issues. The flow of information from media producers can seem inexcusably one-sided; with the exception of letters to the editor and call-in shows, it is difficult for the audience to have its opinions heard. Even then, the people who care most strongly about an issue will be more likely to voice their thoughts, and there is no guarantee that they speak for everyone (most likely, they don't). The fact that citizens form opinions and make important decisions based on information provided by the media makes the situation seem even more egregious: What are the real motivations behind a news story, an advertisement, or a corporate merger? How does one know if a news story is objective or colored by a hidden agenda? At worst, the situation can easily engender vast conspiracy theories of the government and private corporations using the media to control our minds. At best, the media acts as a well-meaning and well-reasoned filter of information that enhances democracy. Either way, the stakes are high.

Fortunately, if one cares to look, several media watchdog organizations are attempting to fulfill the role of honest broker between media producers and consumers. By evaluating one of these organizations, Fairness and Accuracy in Reporting (FAIR), on the criteria set forth in the Monitoring Matrix (see appendix, p. 21), it is possible to delineate the useful applications and fundamental shortcomings of media monitoring in the U.S.

today. After analyzing FAIR, a comparative look at more successful media monitoring systems in other countries and policy recommendations will be offered.

Structure and Membership

FAIR is a nonprofit, national media watchdog group that, according to its Website, "has been offering well-documented criticism of media bias and censorship since 1986."[1] In 2002, FAIR was recognized by international CSR advocates as a "Center of Excellence" in the field of media monitoring.[2] FAIR claims to advocate for greater diversity in the press and scrutinizes media practices that marginalize the public interest as well as minority and dissenting viewpoints.[3] Its primary vehicles for evaluation are designed as media content: FAIR maintains a blog on its Website that is updated multiple times per day; publishes a monthly magazine of media criticism titled *Extra!* that has a minuscule circulation of 8,495; produces a weekly radio show, *Counterspin,* which airs on 130 noncommercial stations throughout the U.S.; and sends out Action Alerts to some 50,000 listserv subscribers.[4]

It is important to note that, while not mentioned explicitly in any of its published material, FAIR espouses a clear liberal ideology. Much of its criticism is directed at conservative-leaning Fox News and other media outlets that support a seemingly Republican agenda. The politics of an organization are not necessarily relevant when evaluating their credibility, but in this case they represent a potential conflict of interest: If FAIR displays a bias against conservative media outlets or Republican-friendly coverage, how can it advocate for "independent" journalism?

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[1] http://www.fair.org/index.php?page=100

[2] "Good News & Bad: The Media, Corporate Social Responsibility and Sustainable Development." 2002. SustainAbility, Ketchum and the United Nations Environment Programme *Gordian Knot* report No. 2. London: The Beacon Press, p. 5

[3] Ibid.

[4] http://lists.nextmark.com/market?page=order/online/datacard&id=93161

FAIR was founded in 1986 by Jeff Cohen, a Los Angeles journalist and lawyer. He served as the group's executive director and later on its board of directors, but stepped down in 2002 to take a full-time job at MSNBC. Today, FAIR has seven full-time staff members and writers, including the editor and publisher of *Extra!,* an activism director, a managing editor, a senior analyst, a program director, and a shipping/sales administrator. According to its Website, FAIR is "run as a collective with the entire staff contributing to organizational decisions."[5] All employees begin with a base salary of $35,000 and receive pay increases of $1,000 per year. Based on information gleaned from staff bios, the highest-paid employee of FAIR is the editor of *Extra!* who makes approximately $55,000 per year.[6]

Financial backing for FAIR comes primarily from the public. Subscriptions to *Extra!* and contributions make up 80 percent of FAIR's revenue. A list of around 400 contributors from 2010 is available on the Website, though individuals can opt out of having their name published; notable donors include famous author Michael Pollan and what appears to be the charity arm of the video-game studio that created *Halo.* Grants from foundations and public charities comprise 12 percent of the operating budget, and the remainder is funded by a combination of the radio show, sales, and "other."[7] On the Web page that details FAIR's financial information, the following statement appears: "FAIR does not accept corporate funding, governmental grants or advertising of any kind."[8] More than any other tidbit about FAIR's operating structure, this sentence intends to distinguish the organization from a traditional media outlet and establish its supposed objectivity—but what it really does or

[5] http://www.fair.org/index.php?page=3063
[6] Individual salaries are not disclosed, however, and it is not clear whether FAIR has maintained a consistent compensation policy since its inception. The $55,000 is merely an estimate since the editor of *Extra!* has been on staff since 1990.
[7] http://www.fair.org/index.php?page=3063
[8] Ibid.

does not mean will be discussed in a later section. For every dollar donated to FAIR, it claims to use 80 cents for research and program activities.

Organizational Essence and Fundamental Shortcomings

FAIR is somewhat unique as a monitoring entity because it combines the techniques of various types of evaluation firms. It works closely with the journalists it monitors, maintaining contact with reporters at news outlets, critiquing stories, and praising exceptional content. In this way FAIR is analogous to a certifying organization, though it lacks a formal "stamp of approval" or a clearly delineated process to determine whether a story or journalist is worthy of praise. FAIR also acts as an activist organization when it employs small-scale advocacy campaigns to encourage the public to contact the media with concerns. For this function it employs tactics similar to those of the Rainforest Alliance, sending out "Action Alerts" to an international network. Finally, FAIR might be characterized as an "armchair reform" organization. In its mission statement, FAIR identifies a fundamental problem in the way that mass media is structured (too many conglomerates) and advocates for vague reform (dismantle media conglomerates? Good luck with that); unfortunately, this "cause" accompanied by a lack of constructive solutions makes FAIR sound like an undergraduate protester who is just discovering injustice in the world. In general, FAIR is long on rhetoric and criticism but perhaps too short on pragmatic solutions. As we will see through a more detailed analysis of its key advocacy issues, FAIR might benefit from narrowing its focus and developing a more analytic framework.

The fact that FAIR founder Cohen was absorbed by or chose to integrate with the mass media he had spent 15 years critiquing highlights the tenuous nature of media monitoring. Given the choice between toiling away as a poorly paid NGO director who may or may not be making a difference and working for a media outlet that values your activist background *and* pays well, it is unsurprising that Cohen left FAIR. His biography brings up a crucial point for understanding FAIR and similar organizations: Many of the best activists, for valid financial and professional reasons, probably defect to the mass media. Whether media critics effect change from within is debatable, and largely impossible to know once they are behind a corporate wall of silence. Thus, in the field of media monitoring, the line between evaluator and evaluated is often blurry—even more so because it is smart business for a traditional media producer to promote an accountability dialogue *within* his or her company rather than make the company susceptible to outside criticism.

The difficulty of evaluating media is even more pronounced when one examines the mediums FAIR uses to expresses its critiques. In an already crowded field of media outlets, FAIR is hamstrung in its ability to reach a large audience because its methods are exactly the same as those of its targets—with one fatal difference. In the U.S., as in other free societies, people choose their media based on some combination of the following rank-ordered elements: 1.) visibility (e.g., if you're staying at a hotel, you'll probably read *USA Today* because it's placed outside your door), 2.) credibility (e.g., does the media outlet *seem* to report the facts), and 3.) similarity to one's own views (e.g., a Tea Partier seeking validation of his or her opinions may watch Fox News). The vast majority of consumers are not trained to question their media sources, and thus are unlikely to seek out alternative viewpoints without being coaxed by something visible. If FAIR could offer a complimentary issue of *Extra!,* hire a celebrity spokesperson, or execute a well-staged publicity stunt, it would be more likely to gain visibility among its target audience. But there is a massive Catch-22 in this scheme: The whole point of advertising is to generate the type of revenue that enables self-promotion, and FAIR does not accept advertising! By relying on word of mouth and the occasional story or blog post being picked up by larger media outlets, FAIR essentially dooms itself to preach to a very small choir.

FAIR's Agenda

Within the overarching framework of its mission—criticizing media bias and censorship, advocating for greater diversity in the press, and scrutinizing media practices that marginalize the public interest—FAIR focuses on several specific topics, generally related to the mass media's coverage of current events. By examining three recent stories and Action Alerts, one gets the sense that FAIR's liberal and/or progressive agenda takes precedence over its attempt to identify censorship or bias. If one equates the public interest with liberal policies, FAIR is the ideal media monitoring organization. This assessment brings up another important point about media evaluation in general. By and large the media monitoring field is not inadequate, it is just intensely partisan. For every group like FAIR, there is a similar right-leaning organization that faults the mainstream media for being too liberal. In the same way people turn to media that reinforces their world view, they are likely to seek out media monitors that regurgitate their opinions on the state of the media. And while objectivity is a difficult concept to evaluate, there must be a better formula to evaluate mass media in a less partisan context; certainly FAIR has not yet figured it out.

The February 2011 issue of *Extra!* features cover stories on the rise of "constitutional conservatism" and criticism of the corporate news media for failing to adequately cover the COP-16 climate talks in Cancún last December. In the report on constitutional conservatism, FAIR Senior Analyst Steve Rendall targets the *Washington*

Post, Fox News, and Rush Limbaugh for lending credibility to "fringe views" about the Obama administration's supposed assault on the Constitution. Through a Nexis database search, he determines that U.S. newspapers and news wires used the term "constitutional conservative/conservatism" 628 times in 2010 (compared to 30 times in 2009 and 12 times in 2000).[9] Rendall also lambasts conservative and libertarian think tanks such as the Heritage Foundation and the Cato Institute for supporting a selective interpretation of the Bill of Rights. In this case, it seems Rendall is correct that the mainstream media have written frequently about constitutional conservatism—but it is unclear why this is a problem, especially because most of the author's targets (Limbaugh, George Will, Fox commentators) are expressing their views through opinion pieces or editorials, *not* hard news. In addition, because Rendall's article lacks a call to action, its ultimate usefulness is questionable.

An Action Alert sent to email subscribers and posted on the FAIR blog on March 1, 2011, presents criticism of a specific journalist and media outlet.[10] Titled "Why Does *USA Today* Hate Public Workers? Paper's Dennis Cauchon continues misleading spin," the piece discusses recent articles in *USA Today* alleging that public workers in Wisconsin earn more than private employees. The Action Alert notes that other newspapers, such as the *New York Times,* have refuted this claim: Public workers only appear to earn more than private employees when compensation is compared without adjusting for the type of work performed. Recipients and readers of the Action Alert are urged to contact the Standards Editor at *USA Today* and register their complaints about the misleading story. The response mechanism FAIR advocates in this and other Action Alerts is perhaps more effective than

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[9] Rendall, Steve. "Pundits Fuel the Right's Latest Rage." *Extra!* February 2011
[10] http://www.fair.org/index.php?page=4254

Rendall's politically motivated criticism. Here, there appears to be a clear factual error in the *USA Today* stories (although it is far from obvious whether *USA Today* and the journalist "hate" public workers) that bears addressing; if enough readers direct an email to the newspaper, perhaps the Standards Editor will publish a correction and adjust future coverage of this story accordingly.

On March 2, 2011, FAIR published and disseminated an Action Alert criticizing ABC's *World News With Diane Sawyer.*[11] Evidently, the program started airing a "Made in America" series on February 28 that encouraged consumers to "buy U.S.-made products in order to spur job growth."[12] FAIR complained that ABC should not target consumers for purchasing foreign-made goods, but rather focus on ABC's parent company, Disney, for manufacturing products overseas. In terms of evidence, FAIR founder Jeff Cohen browsed the Disney Store Website and found that 40 products he clicked on were labeled as imported. FAIR encourages readers to "Tell ABC that its 'Made in America' series should focus more attention on corporations like Disney that choose to rely on overseas labor in order to maximize profits."[13]

This item poses a number of troubling issues. First, while FAIR is correct that multinational corporations wield the ultimate power to determine whether goods are manufactured domestically or abroad, which leaves consumers very little choice, it would not make sense for ABC News to target corporations. ABC News' audience consists of ordinary people (mostly elderly, judging from the commercials) in middle America, not CEOs of powerful companies. The "Made in America" series is intended to raise awareness

[11] http://www.fair.org/index.php?page=4255
[12] Ibid.
[13] Ibid.

among viewers about where their products come from—not skewer manufacturing practices that any businessman with a brain would readily defend. Second, the "evidence" FAIR presents—a cursory scan of the Disney Store Website—is scanty at best. In order to be taken seriously by ABC, Disney, or any other reputable source, FAIR would need to prove empirically that Disney manufactures the majority of its products abroad *and* demonstrate that cost-effective, comparable manufacturing capabilities exists in the U.S. These may be difficult facts to prove, but FAIR's use of cursory anecdotal evidence damages its credibility. In this case, ABC News does not seem to have erred in any fundamental way and FAIR ends up sounding hysterical.

Answering the Credibility Question

So, is FAIR credible as a media monitoring organization? Despite its honorable intentions, the answer is a qualified no. Structural, methodological, and financial weaknesses prevent FAIR from tackling its goals in a comprehensive, replicable manner.

Structurally, FAIR's credibility suffers from the organization's strict adherence to liberal ideology; by filtering its monitoring through a partisan lens, alleged "problems" in the mass media often come across as matters of political opinion. In addition, FAIR's stated goals are too broad and difficult to quantify. What really constitutes bias or censorship, and is it possible for one organization with seven employees to "solve" these problems? Methodologically, FAIR does not employ a standardized data-gathering procedure to identify bias or censorship. Its reliance on Nexis database searches and simple observational research makes every evaluation seem amateurish. Finally, FAIR is caught in a financial trap. By refusing to accept advertising that might compromise its objectivity, the organization can neither promote itself to a wider audience nor build the necessary internal capacity to function effectively. The task of monitoring the mainstream media, which has billions of dollars at its disposal and produces endless streams of information, is a gargantuan one by any standard, but FAIR is too financially constrained to raise sufficient awareness of its cause.

However, FAIR is not an utter failure. It has the most potential, and appears to achieve modest success, when it takes a fact-checking approach to media monitoring. By identifying erroneous information in news stories, as it did in the *USA Today* public worker case, FAIR highlights an essentially undisputable problem and recommends action that may actually make a difference: If enough readers write to *USA Today*'s Standards Editor, the newspaper may correct its course. This may seem like a small victory, but it speaks to the power of organizing a small but dedicated group of consumers to advocate for a common cause. Perhaps FAIR would have more mainstream success and earn credibility if it focused on this type of carefully chosen, focused project.

It is also important to recognize that FAIR's biggest shortcoming is not explicitly its fault. It is unfortunate that the U.S., which rhetorically assigns such high importance to a free press, promotes woefully little debate on the role and methods of responsible journalism. In the same way that a consumer advocacy lobby has been slow to coalesce due to the extreme diversity of the U.S. population, media monitoring suffers from the diffuse, politically charged, high-volume nature of media production. The goal of evaluating and criticizing the mass media is indeed noble and should not be abandoned; in order to fulfill this duty credibly, however, FAIR would need to moderate its ideology, develop empirical evaluation mechanisms, and secure access to significant financial resources. The tradeoffs that might accompany these changes—loss of progressive values, quantitative over qualitative focus, potential pressure from advertisers or donors to skew media evaluations—would irretrievably alter FAIR's essence and alienate its most passionate advocates. For these reasons, it is probably not realistic that FAIR will implement major changes anytime soon. Risking the loss of FAIR's diehard supporters and donors by moderating its stance would likely mean an end to the organization.

Given this unfavorable meta-context, it might also be the case that the criteria used to evaluate FAIR, which were drawn from more straightforward examples of monitoring analysis, may not be entirely applicable. It is relatively easy to identify unsafe working conditions or union busting, then devise quantifiable targets for would-be monitors of these infractions. In the realm of media evaluation, though, the subjects themselves are idiosyncratic. A media producer's motives, bias, or hidden agendas are nearly impossible to parse compared to the number of fire extinguishers on a factory floor. In sum, FAIR may be a "failure" in terms of objective, quantitative monitoring, but it succeeds at raising the salience of important issues and transmitting them to a limited but passionate audience. If that audience seeks out FAIR's partisan world view because it believes in progressive or liberal causes, the organization may be credible in a limited sense.

Alternative Models, Internal Reform, and Examples of Media Monitoring Around the World

By now the shortcomings of FAIR should be quite evident, but an evaluator would be remiss if she did not provide alternative strategies and recommendations. Examples of more robust media evaluation mechanisms do exist, though generally outside the U.S.

A seemingly positive alternative option for media monitoring would be to establish a better government regulatory system. As Richard Locke argues in his examination of

Nike's labor standards, the strength of a country's regulations and institutions is strongly correlated with better working conditions.[14] Might the same lesson apply to the media world? Although the United States Federal Communications Commission (FCC) is an independent government agency charged with "regulating interstate and international communications by radio, television, wire, satellite and cable," its role as a media monitor ends at adjudicating technical issues and levying the occasional obscenity fine.[15]

A better example of government media monitoring might be found in Britain, where the Communications Act of 2003 empowered an organization called Ofcom to act as a independent broadcast regulator.[16] Ofcom's mission is more holistic than that of the FCC: "building public awareness of media literacy to promote the interests of all citizens and to protect them from harm."[17] In addition to providing comprehensive consumer guides for such media services as broadband carriers and cable companies, Ofcom puts the FCC to shame with its streamlined, user-friendly complaint registry.[18] This year, Ofcom unveiled a logo that TV channels in the United Kingdom must use to alert viewers when a UK-produced program contains product placement.[19] These initiatives suggest a potentially positive role for public-sector media regulation—or at least greater consumer advocacy—but the American zeitgeist's fear of big government combined with the government's

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[14] Locke, Richard, Fei Qin, and Alberto Braus. 2006. "Does Monitoring Improve Labor Standards? Lessons from Nike," Corporate Social Responsibility Initiative, Working Paper No. 24, Cambridge: MA: John F. Kennedy School of Government, Harvard University, p. 24
[15] http://www.fcc.gov/aboutus.html
[16] http://www.ofcom.org.uk/about/what-is-ofcom/
[17] Martinsson, Johanna. 2009. "The Role of Media Literacy in the Governance Reform Agenda." World Bank Communication for Governance and Accountability Program, p. 7
[18] The FCC's complaint registry practically requires a compass to navigate (http://esupport.fcc.gov/complaints.htm), whereas Ofcom has a simple click-and-submit interface for feedback.
[19] Prior to 2011, product placement—i.e., when a company pays a TV channel or a program-maker to include its products or brands in a program—was not permitted in UK-produced programming. http://media.ofcom.org.uk/

resistance to change are unlikely to bring about regulatory enhancements anytime soon.

Another reform option for more effective media is to encourage the use of ombudsmen, also known as standards or public editors, across media platforms. According to the Organization of News Ombudsmen, this type of employee "receives and investigates complaints from newspaper readers or listeners or viewers of radio and television stations about accuracy, fairness, balance and good taste in news coverage. He or she recommends appropriate remedies or responses to correct or clarify news reports."[20] The danger of internal monitoring, of course, is that credibility becomes much more difficult to evaluate. When a person receives a salary and benefits from the organization he or she is tasked to criticize, objectivity may become next to impossible. In addition, ombudsmen may delegate their responsibilities to readers and viewers, relying on angry letters to the editor to guide their monitoring agenda. Rather than encouraging a dialogue between consumers and producers, the uncertain or unmotivated ombudsman might slip into the passive role of "complaint desk monitor."

Related to the possibility of internal monitoring is for media organizations to enforce external accountability mechanisms. A comprehensive report developed by the United Nations Environment Programme, a think tank called SustainAbility, and public relations firm Ketchum suggests a number of public interest–minded reforms for the corporate media.[21] In particular, media owners and directors should "establish—at board level—whether the balance between public interest and commercial imperatives is being strategically reviewed, properly managed and publicly disclosed."[22] For giant media

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[20] http://newsombudsmen.org/about
[21] "Good News & Bad" (2002), Executive Summary
[22] Ibid.

conglomerates such as Viacom or Time Warner that attempt to balance entertainment with hard news throughout their countless media holdings, it is difficult to identify a strong enough impetus for such a high-minded internal review process.

Other suggestions include reviewing goals, targets, and performance against governance codes such as the UN Global Compact, the Global Sullivan Principles and SA 8000. While they do not explicitly pertain to the media, the UN Global Compact and Global Sullivan Principles encourage respect for national laws, responsible membership in society, human rights, and equal opportunity for employees.[23] SA 8000 is an international standardized code of conduct for improving working conditions based on the principles of 13 global human rights conventions, including health and safety, freedom of association, wages, and discipline; participating companies are reviewed by independent certification bodies.[24] While admirable goals for any business, these principles fail to address the particularities of media monitoring. Moreover, the shortcoming of any voluntary evaluation mechanism is that it does not guarantee or require robust external verification. Time Warner or Viacom can publicly commit to any standard under the sun, but their statements will lack credibility unless the corporations agree to third-party scrutiny. For the time being, imperfect organizations such as FAIR must fulfill this duty.

Conclusion

Returning to our Disney example from the introduction, the difficulty of determining how ABC News coverage would be affected by an accident in its parent company's theme park should be evident. The media production process is far too opaque, media monitoring organizations are too weak, and most important, most media consumers do not question

[23] http://www.thesullivanfoundation.org/about/global_sullivan_principles
[24] http://www.saasaccreditation.org/certSA8000.htm

what they read in a newspaper or watch on TV. Even if FAIR were to identify a problem with ABC News' coverage, it is wishful thinking to assume its criticism would gain widespread exposure. Improving media literacy among citizens in tandem with stronger media monitoring organizations may be a way to begin addressing these issues.

The World Bank believes that "Media monitoring is an effective tool to instill media literacy, transforming civil society and the public from passive receivers to activists and encouraging accountability in the media."[25] However, any improvement in the media monitoring landscape will require an improvement in media literacy: awareness among consumers of what makes news and how the media covers issues. In order to promote better media literacy, the World Bank suggests incorporating media monitoring projects and networks into larger development initiatives, as well as publishing and promoting media monitoring results to increase awareness and educate citizens about media processes and practices. This may seem like a low-priority task given all of society's pressing problems, but the risk of incomplete, misleading, or at worst manipulative information guiding the public's decisions is even greater.

FAIR is perhaps not an ideal organization, but it represents an important cause and successfully articulates certain views. The issues explored in this analysis have wide-ranging implications for the national discourse: An instrumental part of a free society is a free, accountable press. Furthermore, in the absence of better government regulation and credible internal monitoring on the part of media producers, there is a clear unmet need for neutral third-party evaluators. Even if FAIR lacks the clout and visibility to effect considerable change, it should not give up. FAIR might improve its effectiveness by forming

[25] Martinsson (2009), p. 8

partnerships with other media monitoring organizations of *all* political stripes, combining financial resources to develop common evaluation standards, and merging the human capital expertise of prominent activists to lobby the mass media—on behalf of all citizens—for improvement and accountability.

Discussion Questions

- What is the ideal model for a media monitoring organization? Should the focus be on unsolicited criticism or fee-based consulting services?
- Does ideological partisanship erode the credibility of a media monitoring organization?
- What is the best publicity strategy for a media monitoring organization? Should it appeal to a broad base of consumers or prioritize visibility among the media producers it is evaluating?
- Should media monitoring organizations limit their funding sources to individuals and charitable foundations, or consider alternative revenue generation through advertising or public-private partnerships?
- How does a media monitoring organization develop a credible, empirical evaluation mechanism?
- What internal or voluntary monitoring mechanisms on the media-producer side, if any, might be considered credible?
- Is there a role for increased government regulation of the media to ensure better accountability and objectivity?

Works Cited

Extra! Fairness and Accuracy in Reporting mailing list. 2011. NextMark, Inc. <http://lists.nextmark.com/market?page=order/online/datacard&id=93161>

Fairness and Accuracy in Reporting. <http://fair.org>

Federal Communications Commission. "About the FCC." 2010. <http://www.fcc.gov/aboutus.html>

"Good News & Bad: The Media, Corporate Social Responsibility and Sustainable Development." 2002. SustainAbility, Ketchum and the United Nations Environment Programme, Gordian Knot report No. 2. London: The Beacon Press

"The Global Sullivan Principles of Social Responsibility." Leon H. Sullivan Foundation. <http://www.thesullivanfoundation.org/about/global_sullivan_principles>

Locke, Richard, Fei Qin, and Alberto Braus. 2006. "Does Monitoring Improve Labor Standards? Lessons from Nike," Corporate Social Responsibility Initiative, Working Paper No. 24, Cambridge: MA: John F. Kennedy School of Government, Harvard University

Martinsson, Johanna. 2009. "The Role of Media Literacy in the Governance Reform Agenda." World Bank Communication for Governance and Accountability Program

Ofcom. "What Is Ofcom?" <http://www.ofcom.org.uk/about/what-is-ofcom/>

Organization of News Ombudsmen. "About Us." <http://newsombudsmen.org/about>

Rendall, Steve. "Pundits Fuel the Right's Latest Rage." *Extra!* February 2011

"SA8000 Standard." Social Accountability Accreditation Services. <http://www.saasaccreditation.org/certSA8000.htm>

Appendix

MONITORING ORGANIZATION MATRIX: Fairness and Accuracy in Reporting (FAIR)

DIMENSIONS	SCORE	COMMENTS
I. Autonomy from Target of Monitoring		
a. How autonomous is the organization from the standards-making and target groups?	2.5	Engages with but does not directly work for its target groups; maintains contact with journalists
b. Does the organization fit the third party concept ?	1	
• Money Source: Do they take money from the Target	1	Makes a clear point of refusing to accept money from its target
• Control: governance structure: who sits on the board	4	One point earned for founder recusing himself from Executive Board upon taking a position with corporate media; however, Board members' names are NOT public
are they connected to the Target?		
c. Does the organization charge fees for inspection?	1	
• Who pays the fees?	N/A	No fees collected from targets
II. Organizational Strength		
a. What is the organization's capacity to carry out monitoring?	3	Moderately developed capacity
• Size of staff:	4	Only 7 full-time staff members
• What kind of training is provided to staff?	N/A	Passion for subject seems to constitute "training"
• Educational level of staff:	N/A	No information provided
• Amount of back-up resources? (i.e. accounting, finance, law)	5	Dependent on personal donations; magazine subscriptions
III. Monitoring Practice		
a. How does the organization carry it out?	1	Daily Action Alerts; weekly radio show; monthly magazine
b. How often is monitoring conducted in the field?	5	Entirely external monitoring
c. Is monitoring unannounced?	N/A	
d. How do they select inspection sites?	3	Some ideological bias (focus on right-leaning media). Doesn't question NPR, PBS, etc.
e. How do they interact with the Target?:	3	Not much interaction beyond "letter to the editor"–style complaints
• Do they need permission?	N/A	
IV. Sources of Information		
a. How do they collect data/information?	4	Content analysis; Nexis database searches
b. Do they collect complaints from		
• employees and others?	N/A	Unknown whether org receives "tips" from mainstream media/reporters
• in information gathering?	2	Open to complaints/issues being raised by consumers
c. Is the organization "free" from the target?	1	Perhaps too free: no evidence the media listens to FAIR
V. Standards vs. Monitoring		
a. How are the standards set?	4	Vague or unrealistic goals; some standards seem politically motivated
b. Is the Monitor separate from the standard setter?	N/A	No recognized standard setter in media
VI. Evaluations		
a. Do they ever find violations? How many?	1	Frequent violations identified (at least 3 per day)
b. What do they do with the violations information?	3	Provide recommendations; encourage consumers to contact target
c. How do they measure compliance with the standard ?	4	# of corrections published; change in practices
d. How do they follow up deviation from standard?	2	Good continuity in coverage: Will pursue an issue long-term
VII. Sanctions		
a. Are there any sanction on the target?	3	No binding sanction; multiple complaints may result in embarrassment or inconvenience for target
b. Who administers a sanction?	N/A	
c. How effective are sanctions?	4	No evidence of sustained success
VIII. Transparency of Monitoring Organization		
a. How transparent is the organization? How much public information does it provide?	3	Transparent financial data; all reports are public; Board member names not published
b. Can you learn about I-VII from the company's website? From calling?	3	Decent info available, but did not respond to requests for comment/interview
c. Is the following information made available?		
• Money,	1	
• Board control	4	Potentially suspicious lack of public info about Executive Board
• Process,	1	Methods are clear & publicly available
• Staff, etc. ?	1	Comprehensive staff bios
XI. Shadow of the State		
a. Does the organization rely on Government information or regulations?	3	Occasional use of FOIA
b. Does the organization rely on Governmental rules of information provision?	3	See above
c. Does it require government support to obtain informaton from target?	3	Only in cases of info being withheld by corporations