

With the foregoing as general guidance, the matter of amount of time and selection of program for presentation of reply is left to the good faith and reasonable judgment of the licensee. The response should be presented. You are requested to notify this Commission as to the steps taken to achieve compliance with this ruling.

There is the followup and there was this request for justification. I just bring this up to clarify the record and make it a little more complete.

Dean BARROW. Dr. Goldin.

Mr. GOLDIN. I think there is one area of this discussion where there hasn't been too much concern. We have talked about the individual broadcaster, but as everybody knows, the broadcasting industry operates both in terms of an individual market and also on a nationwide basis. I think one of the most significant aspects is the nationwide operation, as well as the local operation.

It is a fact that three networks have an opportunity to reach all of the homes of the country, particularly between the hours of 7:30 and 11.

In fact, they do very well in reaching all those homes. So that at any one time there may be as many as 20 or 30 million homes watching a program from one source. Networks have been exemplary, I think, in the fairness area.

I don't think there has ever been a complaint about that. The Commission has never chastised a network in terms of an error in fairness, it has never found one guilty. But from a structural standpoint there is an enormous degree of power which resides in the network organization.

I am aware, of course, that in order for that program to get on the air, each of the individual affiliates in the 200 markets has to carry the program, or some large number of them.

However, as a matter of fact, when we go into the real world, by and large, most of the affiliates carry most of the network programs. The network organization, itself, has owned and operated stations in five of the larger markets of the country.

What I am saying is that there is a tremendous potential danger. Fortunately, that danger has not been actualized. What I am saying is I cannot visualize a network structure which doesn't have on the other side of it a Fairness Doctrine, Mr. Chairman, not because they have done any evil, but because I think structurally there should be this counterweight.

Dean BARROW. Mr. Robinson.

Mr. ROBINSON. On this market structure idea, it is a bit curious to me that the Commission seems to take the position that there is in broadcasting an inherent monopoly—and at the same time there is talk about the concentration of ownership of newspapers and radio or television stations in the same city—yet the Commission's policies dealing with concentration and monopoly have been, I think, a total failure. The fact is they just recently abandoned their top 50 rule-making proposal which would have presumably directed itself to one aspect of what Dr. Goldin has mentioned, this idea of concentration.

Nor have they rigorously enforced any separation between newspaper and broadcast ownership in spite of their statements, often repeated, that this is an adverse factor in comparative hearings.