

Transaction Compliance Report

MB Docket No. 10-56

NBCUniversal Non-Profit News Partnerships

for the period of January 28, 2013 through July 28, 2013



July 29, 2013

To the Federal Communications Commission:

This report provides the information required by Condition XI.5.f of Appendix A (the "Condition") to the *Transaction Order*¹ regarding NBCUniversal's non-profit news partnership arrangements.

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Online Copy

A copy of this report is available on the websites maintained by each of the stations that comprise the NBCUniversal Owned Television Stations division (e.g. www.nbcchicago.com).

¹ *In the Matter of Applications of Comcast Corporation, General Electric Company, and NBC Universal, Inc. for Consent to Assign Licenses and Transfer Control of Licensees*, Memorandum Opinion and Order, 26 FCC Rcd 4238 (2011) (as amended by an Erratum released on March 9, 2011) (*Transaction Order*).

Background

As required by the Condition, and as previously reported, four of the 10 stations in the NBCUniversal Owned Television Stations division (“NBCOTS”) have established and maintain cooperative arrangements with locally-focused, non-profit news organizations: NBC 4 New York and ProPublica; NBC 5 Chicago and *The Chicago Reporter*; NBC10 Philadelphia and WHYY; and NBC4 Southern California and KPCC – Southern California Public Radio. These continuing agreements, plus the ongoing relationship between NBC 7 San Diego and the Voice of San Diego, mean that half of the NBCOTS stations have news partnership agreements in place.²

Collaborations between the stations’ news departments and the non-profit partners involve sharing data, research, and investigative resources. These partnerships have resulted in at least two dozen investigations, and have generated dozens of on-air and online news reports for the stations, as well as on the partners’ radio stations and websites. Examples of the collaborations occurring during the reporting period are detailed below.

NBC 4 New York and ProPublica

NBC 4’s partnership with ProPublica continues to generate compelling investigative reports. ProPublica regularly briefs NBC 4 staff on upcoming investigations so that NBC 4 and the other NBCOTS stations can prepare companion reports. For its part, NBC 4’s investigative unit, the I-Team, has contributed investigative resources and know-how to bolster ProPublica’s investigations. For example, as detailed below, NBC 4 reporter Chris Glorioso contributed his expertise with New Jersey’s Open Public Records Law to help ProPublica obtain copies of New Jersey Department of Labor and Workforce Development enforcement actions for a story on day-labor abuses.

Collaboration in Practice

Pipeline Safety. In February 2013, the I-Team interviewed New York City residents who were concerned about the installation of a new natural gas pipeline in a densely populated section of Manhattan. The report cited statistics obtained from a ProPublica database that tracks significant pipeline incidents in the United States, including the age of the pipeline, the reason it broke, and if anyone was killed or injured. The story aired on the 11:00PM newscast on February 19, 2013 and during the 5:00PM newscast on the following day. An online version of the report featuring video of the full segment and links to the ProPublica pipeline safety database was featured on NBCNewYork.com.³

Pharmaceutical Companies’ Payments to Doctors. Using ProPublica’s database of pharmaceutical company payouts to medical professionals, NBC 4 found that some of the

² As previously reported, the NBCUniversal owned station in Miami-Ft. Lauderdale, NBC 6 South Florida, has partnered with the non-profit Florida Center for Investigative Reporting (FCIR) to enhance the station’s local investigative reporting capabilities. The first joint investigative story on boating safety ran on the 11:00PM newscast on NBC 6 on April 29, 2013 and was posted on the NBC 6 and FCIR websites on April 30, 2013. See Mc Nelly Torres and FCIR, *After Increase in Boater Deaths in Florida, A Look at Boating Regulations*, <http://www.nbcmiami.com/investigations/After-Increase-in-Boater-Deaths-in-Florida-A-Look-At-Boating-Regulations-204924341.html> (Apr. 30, 2013); FCIR, *Visualized: Boating Accidents in Florida, 2011*, <http://fcir.org/2013/04/30/visualized-boating-accidents-in-florida-2011/> (Apr. 30, 2013).

³ C. Glorioso and T. Burke, *I-Team: Pipeline Safety Problems Worry West Village Residents*, <http://www.nbcnewyork.com/news/local/Natural-Gas-Pipeline-Accident-Explosion-Concerns-New-York-City-West-Village-191739921.html> (Feb. 20, 2013).

New York doctors who write the most Medicaid prescriptions are also compensated for giving promotional talks for pharmaceutical companies – including the manufacturers of some of drugs they prescribe. The story aired on March 17, 2013 during the 11:00PM newscast and the following day during the 5:30PM newscast.⁴ The on-air segments were accompanied by web stories offering more detail as well as links to ProPublica's databases.⁵

Disciplining Prosecutors. I-Team reporter Chris Glorioso collaborated with ProPublica on a report examining the incidence of disciplinary actions for prosecutorial misconduct in the Bronx District Attorney's Office. I-Team and ProPublica investigators found only one instance where an Assistant District Attorney was seriously disciplined despite wrongfully convicting an innocent person. The story aired on the 5:00PM newscast on April 8, 2013.⁶

Day Labor Abuses. In June 2013, I-Team reporter Chris Glorioso collaborated with ProPublica on a report revealing temporary employment agencies that have been fined for failing to pay their laborers. The story exposed agencies that have been repeatedly fined for failing to pay laborers for entire days of work, as well as the fact that some of the region's largest day-labor employment agencies routinely charge their own temporary employees for transportation and supplies needed to access worksites. The story is scheduled to air soon on NBC 4.

NBC 5 Chicago and *The Chicago Reporter*

NBC 5 and *The Reporter* continue to explore new ways to assist each other's investigations. For instance, NBC 5 has used NBCChicago.com to highlight *The Reporter* stories which did not have a visual component conducive to an on-air piece, but which nevertheless deserve the enhanced attention and coverage that the partnership provides.⁷

Collaboration in Practice

Jail Sentences for Non-Violent Felonies. NBC 5 partnered with *The Reporter* on a story related to the paper's investigation of the increasingly harsh sentences being imposed for some non-violent felonies, and the resulting costs of incarcerating Chicagoans convicted of those charges. *The Reporter* analyzed these costs and plotted them geographically in order to look at sentencing rates for individual Chicago neighborhoods. NBC 5 reporter Dick Johnson interviewed ex-convicts, activists, and criminologists about the multi-billion dollar cost of keeping non-violent offenders behind bars, and how some of that money

⁴ NBC Video: <http://www.nbcnewyork.com/video/#!/on-air/as-seen-on/I-Team-Examines-Big-Pharma-Money-to-Docs/198710491>; NBC Video: <http://www.nbcnewyork.com/video/#!/on-air/as-seen-on/I-Team-Examines-Big-Pharma-Money-to-Docs/198710491>

⁵ C. Glorioso and T. Burke, I-Team Examines Pharmaceutical Company Payments to Doctors, <http://www.nbcnewyork.com/investigations/Dollars-for-Docs-Drug-Companies-Doctors-Money-Pharmaceutical-ProPublica-198698641.html> (Mar. 18, 2013).

⁶ C. Glorioso and T. Burke, I-Team: NYC Prosecutors Rarely Punished When Convictions Crumble, <http://www.nbcnewyork.com/news/local/Prosecutors-Punished-Wrongful-Convictions-NYC-District-Attorneys-201827511.html> (Apr. 8, 2013).

⁷ NBC 5 has continued to collaborate with the Better Government Association (BGA), a long-established non-profit watchdog that investigates allegations of waste, fraud, and corruption in local and state government. See, e.g., P. Rogers, Jesse White: Zero Tolerance for Cops, Booze, <http://www.nbcchicago.com/investigations/illinois-secretary-state-jesse-white-uniform-police-alcohol-192634871.html> (Apr. 1, 2013).

might be better spent on crime prevention and job creation. NBC 5 aired and promoted the story on March 4, 2013 during its 10:00PM newscast and published an accompanying online article linking to *The Reporter's* own story.⁸

Human Trafficking. *The Reporter* provided assistance for the latest in a series of NBC 5 anchor/reporter Marion Brooks' stories on human trafficking. *The Reporter* analyzed sentencing data which demonstrated that charges for prostitution-related felonies are brought almost exclusively against sex workers, and not their patrons, though the prostitutes are sometimes found to be themselves victims of human trafficking. NBCChicago.com published an online article and video discussing *The Reporter's* findings concerning prostitution-related felonies and arrests.⁹ The story aired on NBC 5's 10:00PM newscast on June 20, 2013.

Mandatory Sentences for Gun Violations. In another investigation, *The Reporter* looked at one state legislator's proposal to increase mandatory sentences for gun violations. *The Reporter* story estimated that the cost to taxpayers would have increased by \$780 million over the last decade if the harsher sentences had been in place. NBC 5's Dick Johnson interviewed experts on both sides of the issue for an on-air version of *The Reporter's* investigation. The story was aired and promoted on May 10, 2013 during NBC 5's 10:00PM newscast, and the station published an accompanying online article on NBCChicago.com which also linked to *The Reporter's* story.¹⁰

Deportation of Undocumented Workers. A *Reporter* investigation revealed that thousands of Chicago-area undocumented workers are being deported with no opportunity to appear in immigration court, mainly because they had previous deportation orders. For that story, NBC 5 posted a companion article online, highlighting the investigation and pointing viewers to the full story in *The Reporter's* latest issue.¹¹

Shootings in Chicago. NBC 5 highlighted an analysis done by *The Reporter* showing that more than half of all the shootings in Chicago in 2012 involved people younger than 25 as the shooter, the victim, or both. The NBC 5 online story posted on January 30, 2013 directed readers to *The Reporter's* analysis.¹²

⁸ D. Johnson and K. Smyser, Taxpayers Spent \$5.3B in Last Decade to Lock Up Chicagoans, <http://www.nbcchicago.com/investigations/nbc-chicago-reporter-cost-incarceration-195116091.html> (May 10, 2013).

⁹ M. Brooks, The World of Human Trafficking: One Woman's Story, <http://www.nbcchicago.com/investigations/human-trafficking-alex-campbell-192415731.html> (Feb. 22, 2013).

¹⁰ D. Johnson, Sentencing Bill Could Cost Taxpayers \$760 Million Over 10 Years, <http://www.nbcchicago.com/investigations/Gun-Sentencing-Bill-Could-Cost-Taxpayers--206993491.html> (May 10, 2013).

¹¹ NBC 5 Investigates: Thousands Deported with No Court Hearing, <http://www.nbcchicago.com/investigations/Thousands-Deported-With-No-Court-Hearing-205977911.html> (May 3, 2013).

¹² K. Smyser, Youth Involved in Majority of Chicago Murders: Report, <http://www.nbcchicago.com/news/local/Youth-Involved-in-Most-Chicago-Murders-Report-189072791.html> (Apr. 1, 2013).

Collaboration with ProPublica. Tailoring ProPublica's data to the local market, NBC 5 looked at the Chicago area doctors who have received the most money from pharmaceutical companies in the past few years, and found doctors taking hundreds of thousands of dollars in fees from companies whose drugs they may then prescribe to their patients. The story ran and was promoted on May 15, 2013 during NBC 5's 10:00PM newscast, along with a companion article on NBCChicago.com that included ProPublica's "Dollars for Docs" search widget and a link to ProPublica's website for viewers seeking further information on their own doctors.¹³

NBC10 Philadelphia and WHYY

NBC10 and WHYY continue crosslinking investigative and general news content on their respective websites, NBCPhiladelphia.com and WHYY's NewsWorks.org. NBC10 now posts an average of two NewsWorks.org stories directly on its website each day, rather than simply linking back to WHYY's site. NewsWorks.org reports were even featured on NBCNews.com, the homepage of NBC News and one of the leading online news sites.¹⁴

Links embedded in the byline and in the body of the article drive readers back to NewsWorks.org,¹⁵ which received thousands of referrals from NBCPhiladelphia.com during the reporting period. Daily postings also ensure that NBCPhiladelphia.com visitors benefit from timely access to WHYY's in-depth reports.¹⁶ The content partnership extends to social media, where WHYY and NBC10's respective Twitter accounts (@NewsWorksWHYY and @NBCPhiladelphia) frequently re-tweet updates and story links, including NBC10's live news coverage.



In addition, NBC10 will be promoting NewsWorks.org content on its on-air reports in order to increase the audience for the NewsWorks.org site.

¹³ K. Smyser and N. Kwan, Docs Paid Thousand to Promote Drugs They Prescribe, <http://www.nbcchicago.com/investigations/doctors-prescription-drugs--207652001.html> (May 15, 2013).

¹⁴ See, e.g., T. Samuelson, NewsWorks.org, Decision Expected in Much-Watched NJ Dune Case, http://www.nbcnews.com/id/52419035/ns/local_news-philadelphia_pa/t/decision-expected-much-watched-nj-dune-case/#.UegJKtJN-So (Jul. 8, 2013).

¹⁵ See, e.g., P. Gregory, Most N.J. Voters Disagree with Christie on Setting Oct. Senate Election, <http://www.nbcphiladelphia.com/news/local/Most-NJ-Voters-Disagree-With-Christie-on-Setting-Oct-Senate-Election-211419741.html> (Jun. 13, 2013).

¹⁶ B. Hickey and M. Grady, NewsWorks.org, Radar Gun Finds Dangerous Driving Near Area Schools, <http://www.nbcphiladelphia.com/news/local/Radar-Gun-Finds-Dangerous-Driving-Near-Area-Schools-210563411.html> (Jun. 17, 2013).

NBC4 Southern California and KPCC

NBC4 supports Southern California Public Radio's KPCC radio station through producer and talent resources, material acquired in the field, and both on-air and online promotion. While there are formal arrangements – such as shared coverage of the Los Angeles Mayoral Debate – NBC4 and KPCC also collaborate on “day-of” and breaking news as the stations exchange information they uncover during the course of daily newsgathering, especially on big stories. NBC4 also helps KPCC augment its live coverage of breaking news with NBC4 reporters providing frequent on-air reports for KPCC's listeners.

Collaboration in Practice

Campaign Contributions for Los Angeles Mayoral Candidates. NBC4 and KPCC collaborated on an analysis of campaign contributions by movie studios to Los Angeles mayoral candidates. The report aired January 10, 2013 on both KPCC and NBC4 and a video was posted to the NBC4 website the next day.¹⁷

Dorner Manhunt. NBC4 worked closely with KPCC on the coverage of the manhunt for former LAPD officer Christopher Dorner. Shortly after the story broke, KPCC and NBC4 sent Freedom of Information Act (FOIA) requests to various public agencies for records pertaining to those singled out as potential targets in Dorner's highly publicized “manifesto,” his military background, and information about his weapons. KPCC transmitted NBC4's coverage for most of the afternoon when Dorner was finally spotted and ultimately killed in a police firefight. Joint coverage began airing on February 6, 2013, continuing through February 15, 2013, while the first story produced in collaboration with KPCC aired on February 7, 2013.¹⁸ On February 9 and 10, 2013, NBC4's reporter Jacob Rascon provided live reports to KPCC from Big Bear, CA, where authorities had assembled a command post.¹⁹

Los Angeles Mayoral Race. NBC4 teamed up with KPCC to simulcast the Mayoral Primary Debate which aired live from 7:00PM to 8:00PM on January 28, 2013.²⁰ This led to a full partnership for the April debate between the two remaining Mayoral candidates. NBC4's Conan Nolan moderated the debate, while Frank Stoltz of KPCC was a member

¹⁷ S. McNary, Garcetti, Greuel Get Most Show Biz Donations in Mayor's Race, <http://www.scpr.org/blogs/politics/2013/01/10/11939/hollywood-gives-big-l-mayors-race> (Jan. 10, 2013); NBC4 Video: <http://www.nbctv.com/video/#!/on-air/as-seen-on/Hollywood-Pours-Campaign-Contributions-Into-LA-Mayors-Race/186544921>.

¹⁸ L. Brenner and E. Zassenhaus, LAPD Manhunt: Profiles of Wanted Murder Suspect Christopher Donner, Shooting Victims, <http://www.scpr.org/blogs/news/2013/02/07/12459/lapd-manhunt-profiles-of-wanted-murder-suspect-chr/> (Feb. 7, 2013); NBC4 Video: <http://www.nbctv.com/video/#!/on-air/as-seen-on/Ex-LAPD-Officer-Threatens-Former-Colleagues-in-Manifesto--Police/190154991>.

¹⁹ KPCC Staff, LAPD Manhunt: No Sign of Donner in Big Bear; Riverside Mourns; Search Continues, <http://www.scpr.org/news/2013/02/07/35875/lapd-manhunt-veteran-riverside-officer-shot-dead-2/> (Feb. 7, 2013); NBC4 Video: <http://www.nbctv.com/video/#!/on-air/as-seen-on/Search-Continues-in-Big-Bear-for-Dorner/190623281.com/video/#!/on-air/as-seen-on/Search-for-Christopher-Dorner-Scaled-Back-in-Big-Bear-Lake/190638511>.

²⁰ NBCLosAngeles.com, Watch: Los Angeles Mayoral Debate, <http://www.nbctv.com/news/local/Watch-Live-KPCC-Los-Angeles-LA-Mayoral-Debate-190124921.html> (Feb. 6, 2013).

of the panel. The two stations, along with Telemundo's Los Angeles station, KVEA, collaborated on the editorial content of the debate, which aired April 22, 2013 at 7:00PM.²¹

Powerhouse Fire. Several NBC4 reporters provided coverage to KPCC of a major fire just North of Los Angeles for KPCC. KPCC also linked to NBC4 coverage of the fire.²²

²¹ NBC4 Video: <http://www.nbclosangeles.com/video/#!/on-air/as-seen-on/LA-Mayoral-Debate--Part-1/204385591> (Apr. 23, 2013).

²² KPCC & Wires, Updated: Powerhouse Fire has Burned 1,800 Acres; Evacuations Ordered, <http://www.scpr.org/blogs/news/2013/05/31/13849/powerhouse-fire-overnight-evacuations-orded-after/> (May 31, 2013).