

Localism in American media policy, 1920-34: reconsidering a 'bedrock concept'¹

Bill Kirkpatrick

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Abstract

Scholars tend to agree that the weak implementation of affirmative localism in US media is primarily due to either the failure of regulators to enforce the principle, or the unworkability of the concept of localism itself. By 'affirmative localism' I refer to efforts to foster geographically based local identities and local public spheres through a licensee's program service. This study revisits the history of localism to demonstrate that early regulators were not primarily concerned with fostering affirmative localism, but instead used discourses and structures of localism as part of a class-based project of cultural and economic modernization of local communities through radio. In this view, regulatory concepts such as local program service and local trusteeship were used to reduce local distinctiveness, limit program diversity, and retain content control with nationally minded regulators in Washington. These regulators' corporate and cosmopolitan vision of modernity is problematic in many ways, but their relative success in using localism to advance that vision calls into question the Federal Radio Commission's reputation for weakness and incompetence. It also suggests that affirmative localism, since it was actively suppressed by regulators in the formative years of US radio, cannot be considered a failed or unworkable concept for broadcasting policy in itself.

Keywords

Broadcasting in the United States, Commerce Department, Federal Radio Commission, History, Localism, Media Policy, Radio, Social Conditions 1920-34

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Introduction

Scholars agree that localism is an important concept in American media; it is often referred to as a 'bedrock concept' (Silverman and Tobenkin: 471) and a 'basic principle of broadcast policy in the United States' (Anderson and Curtin: 289). Indeed, in contrast to the more centralized, national model of, say, the BBC, localism is considered one of the oldest and most important organizing tenets guiding the creation and regulation of American media, privileging affirmative efforts to foster geographically-based local identities and local public spheres through a licensee's program service.² But there has always been a problem with media histories that centre localism: for a 'bedrock concept', localism has had a disappointing career. As Robert Horwitz put it, regulators merely 'preach[ed] the desirability of localism while constructing no supports for the policy in regulatory practice' (Horwitz: 129). To say the least, this is a curious fate for such an important principle that 'has been at the foundation of US policy from the beginning' (Newton: 10-11).

This failure to construct supports for localism has elicited various explanations. The most common is the 'capture' thesis, arguing that regulators were too beholden to wealthy national broadcast interests like RCA to actually enforce localist policy (e.g. Lundstedt and Spicer: 294-95; Sobel: 74). For other scholars, localism was simply an unfortunate error borne of parochialism on the part of early regulators: 'Although the perception of need for service to localities in the late 1920s was certainly more understandable and realistic than today, the conclusion that the need was great was not compelled' (Collins: 572). Similarly, some declare

² Michele Hilmes (2003) has made the point that Great Britain and the United States each used an ideologically potent caricature of the other's radio system in order to put broadcasting into the hands of their respective elites. This article seeks to add to our understanding of that process in the United States by examining the ways in which the potentially democratic and populist discourse of localism was used to encourage an elite national programming style for American radio.

localism the product of wishful thinking for bygone days, a policy rooted in wispy nostalgia for pre-modern life: '[L]ocalism ... was anachronistic from its earliest moments ... a social fantasy' (Anderson and Curtin: 293-94). For yet others, including Horwitz and Don Le Duc, the economic power of various broadcasting interests made enforcement simply impossible: 'To truly uphold localism would have inevitably undermined how the industry actually functioned' (Horwitz: 129).

Whether a media policy founded on localism was just a bad mistake, the product of delusional thinking, or a victim of regulatory hypocrisy and the power of large commercial broadcasters, scholars agree that its weak implementation flowed from one of two sources: either regulators were corrupt, weak, and/or incompetent, or localism was an unworkable or even silly idea to begin with. If we accept this received scholarship as the final word, the result is bad news all around. Localism as a policy value in US media continues to suffer the stigma of being an unrealistic and impractical concept, weakening arguments against media consolidation and centralization (e.g. Silverman and Tobenkin: 471; Noll et al.: 116-20). Regulators, most notably the much-derided Federal Radio Commission, get a bad historical rap as dreamers, hacks, or worse, giving fuel to calls for deregulation by those who point to a long history of regulatory incompetence. And our understanding of media policy—how it works, the forces that shape it—remains stunted by imputations of false consciousness and economic determinism.

This article seeks to intervene in this question by offering a new hypothesis, that before 1934, regulators mostly *succeeded* in implementing localism the way that they wanted to, and the confusion derives from a misunderstanding of what exactly they wanted localism to accomplish. Whereas most scholars imagine that regulators wanted policies of localism to preserve unique local identities and nurture diverse local publics, I argue that regulators used discourses and

structures of localism as part of a modernizing project in radio, seeking to incorporate the local into a class-specific vision of a 'modern' American nation.

I hope to demonstrate that radio regulation got caught in the middle of an important structuring struggle during this era between an emerging 'national class' and the traditional local middle class. National-class discourses privileged the growing translocal corporate economy with its values of efficiency, rationality, and cosmopolitan cultural tastes; the vision of America thereby collectively formed was urban, nationally minded, and self-consciously 'modern'. The local middle class, in contrast, sought to protect both its economic base and the 'traditional' values of local self-sufficiency, anti-urbanism, and social power derived from local standing and interpersonal reputation. I will elaborate on this clash below, but the point for my argument is that radio regulation before 1934 privileged a cosmopolitan and corporate vision of 'modern' America, within which the function of localism was not to preserve or recover pre-modern life, but to bring modernity to the local—to stitch the pre-modern local into the modern national, as it were. Far from valuing local diversity and idiosyncrasies, regulators never wavered from their belief that national-class standards of professionalism and taste represented the highest and best use of the medium, and they used localist discourses and structures to try to impose those standards on hundreds of individual stations, stitching them into a national system precisely by flattening local distinctiveness, suppressing local identities, and encouraging the displacement of local provincialism by a vision of modern nationalism through radio. Put another way, localism was a tool that regulators used to achieve a nationalizing goal, not an end in itself.

Indeed, for these regulators and their national-class allies, hundreds of local stations were, if anything, an inherited problem to be overcome, not a desirable condition to be further cultivated. They suffered no nostalgic fantasies and held no unrealistic perceptions about the

need for and workability of affirmative localism. The fact is, one searches very nearly in vain among the words and deeds of early regulators for the romantic or nostalgic ideas about localism that contemporary scholars imagine they must have had. Where are the paeans to the role of broadcasting in the cultivation of vibrant local public spheres? The celebrations of grass-roots talent and radio's contribution to the perpetuation of small-town values and rural identities? Where, in short, is the 'social fantasy'? Instead of a plethora of such discourses, one finds a plethora of criticisms of local broadcasting, which regulators considered a pale shadow of what the medium should be. Too much localism even threatened to kill off broadcasting altogether; as early as 1924, Commerce Secretary Herbert Hoover flatly stated, 'The local material available for the local program is not in my view enough to maintain assured interest, and therefore the industry, or to adequately fulfill the broadcasting mission' (Hoover 1924d). This attitude continued into the FRC era; a typical instance occurred in the case of WMAL, a Washington, D.C. local that wished to become an NBC Blue Network affiliate. In granting the transfer, the FRC opined:

It appears, with justification, that a more desirable program service can be rendered by the station under network affiliations than is possible with WMAL broadcasting purely local features. ... Although the service now rendered by WMAL ... is generally good the programs as a whole are undoubtedly inferior in quality and point of interest to those which would be presented by [NBC] (FRC 1933a).

Significantly, the WMAL case was not just another ordinary license transfer: since it affected the D.C. market, the Commissioners were also deciding what kind of radio they themselves would get to listen to when they went home at night, and they clearly did not want it to be WMAL's 'undoubtedly inferior' local features.

With that in mind, the remainder of this article examines how regulators used localism to advance the project of modernization through radio prior to 1934. I begin by discussing the class-

based cultural schisms of the era that positioned the 'local' as antithetical to the 'modern'. After describing the inherited structures of the broadcasting system, I turn to a close analysis of FRC licensing decisions to demonstrate their understanding of and approach to localism. I hope to show that regulators used discourses and structures of localism to legitimate a range of procedures and decisions that had the cumulative effect of suppressing local diversity in broadcasting, including relegating small 'local' stations to disadvantageous power and frequency allocations; enforcing 'modern' corporate norms of finance and administration; imposing national-class expectations of professionalism and technical modernization on many previously artisanal or 'mom-and-pop' broadcasters; discouraging local idiosyncrasies and subcultures while encouraging a narrow range of acceptable programming; and finally, retaining content control at the federal level through a trusteeship system that denied standing to the ostensible benefactors and guarantors of that system, the local radio audience. Such actions helped entrench the national commercial system, and although regulators' attitudes would shift after 1934, leading to a new era of encouraging affirmative localism, national-class attitudes toward the local in this formative 1920-1934 period continue to affect the US media system today.

Radio as modernizer

To understand localism in early US radio, it is important to situate it within a profound class shift began in the late nineteenth century and continued throughout the 1920s. Many scholars have studied this shift using a variety of terms and analytic frameworks,³ and although their concerns and conclusions differ, they tend to agree on one large trend: cultural elites,

³ Indispensable works by a range of authors contribute substantially to our understanding of the period, including Kammen (1991), Trachtenberg (1982), Levine (1988), Hofstadter (1955), Boyer (1978); Wiebe (1995). For the purposes of this study, I will draw primarily on the terms established by Robert Wiebe, who argues that the American middle class effectively bifurcated along cultural lines beginning in the 1880s; he calls the two halves the 'national class' and the 'traditional local middle class'. An earlier reference to the 'national class', describing the same social formation and class shifts as Wiebe, can also be found in Carey (1993).

intellectuals, and professionals in the new corporate-industrial economy began to pursue a cultural and political project distinct from their predecessors and peers. They began to distinguish themselves from the traditional local middle class by privileging national identifications and associations over local ones, and by privileging urban cosmopolitan values over rural and village provincialism. Robert Wiebe calls this wealthy new cohort the national class, and it was this group that was most responsible for transforming the United States from a rurally oriented commercial-agrarian society into one that was fundamentally urban, national, and corporate-industrial in its outlook. This class was national 'both in the sense of transcending local attachments or boundaries and in the sense of holding central, strategic positions in American society' (Wiebe: 141-42). These included managerial roles in the growing corporate order, as well as specialized technical professions such as economics or physical chemistry, new fields that made sense only in the increasingly interdependent economic structure of modern capitalism.

As Wiebe points out, these nationalizers were mostly found in the cities, 'both because their skills fit neatly into city life and because they took America's urban future for granted' (Wiebe: 142). Their outlook was self-consciously cosmopolitan and 'modern', and they held to centralization, efficiency, and expertise as core values. Increasingly, too, the growing division between the national and the traditional middle class expressed itself in specific policy questions, such as their attitude toward chain stores: were they a sign of progress, offering consumers more choices and lower prices through efficiency and rationalization, or an unfair and ruthless threat to local economies and traditional businessmen? The local middle class, whose fortunes were closely tied to real estate and retail sales, ratcheted up long-standing discourses of local boosterism, while the national class tended to accept such developments—if not entirely without

anxiety—certainly with greater equanimity.⁴ It is important to note that the 'national class' is best understood not as actual individuals but as a discursive formation within which many intellectuals and professionals understood the radically changed America of the twentieth century: discourses with a non-necessary correlation with actual individuals.⁵ As such, it was most visibly expressed in tastes and values, and this cultural dimension of class identity helps explain many of the ways in which the two classes distinguished themselves during this period.

Discourses of localism were consistently at the centre of this cultural clash and in fact became emblematic of it. The word 'localism' itself, which often appeared with a derogatory adjective attached (as in 'vulgar localism'), rarely connoted anything good in the literature of the national class, representing instead a range of nostalgic, moralizing, or illiberal traits, including 'traditional', 'provincial', 'parochial', 'old-fashioned', and 'backward'. For example, H. L. Mencken regularly vented the national class's impatience with the 'prehensile morons' of local America, gleefully assaulting 'the yokel's congenital and incurable hatred of the city man--his simian rage against everyone who ... is having a better time than he is' (Mencken: 293). In contrast, the 'city man' was modern instead of traditional, cosmopolitan instead of provincial, rational instead of irrational, open-minded instead of ignorant, tolerant rather than bigoted, and so on. These tropes further enabled the nationalizers to justify their place in an American economic order—an order that increasingly called for and rewarded the qualities that the national class arrogated to itself—and elevate themselves culturally above their less developed compatriots. The attitudes and

⁴ For more on this anxiety accompanying specialization, professionalization, and centralization, see Levine (1988), p. 207.

⁵ Pierre Bourdieu (1984) has argued that cultural markers constitute a key element of the social production of class, and his theories provide a good framework for understanding this shift. In particular, Bourdieu argues that our definitions of class cannot be limited (as in a perhaps reductionist reading of Marx) to economic resources alone, but must also encompass the cultural and social resources that help account for both the differences among classes and the persistence of class identity and status despite the theoretical possibility of greater economic mobility. Factors such as cultural competencies and aesthetic tastes enable classes to distinguish and perpetuate themselves, and non-necessary correlations of class with particular (but shifting) discourses and attitudes provide the means by which classes come to know and identify themselves, both within the group itself and within society at large.

characteristics they associated with the interests, politics, and cultural outlook of the traditional middle class were thus rhetorically erased from the nationalizers' lexicon of positive individual traits and social structures, and with it from their vision of the modern nation. Dull provincials who were too contented in their own narrow local world-views could not be counted on to effectively manage the changes of modern America or advance the national interest. It goes without saying that, as with any class identity, none of these tropes actually described objective differences between the national class and the rest of society, at least not in any consistent, sustained, and widespread sense that would stand up to empirical investigation. However, this complex of national vs. local discourses does delineate the rhetoric by which and through which a growing number of urban elites advanced their interests and tastes vis-à-vis the rest of society.

In particular, these new national-class discourses privileged modern urban culture at the expense of local small-town life. '[N]ow the city', wrote Richard Hofstadter, 'was providing to the nation at large the archetype of the good life' (Hofstadter: 294). Millions of ordinary Americans celebrated the fruits of urbanization and modernization, including an increasingly complex and diverse culture, drawing on ethnic and immigrant strands, as well as on shifts in the structures of labour and leisure. At the same time, urban intellectuals like Sinclair Lewis waged what Hofstadter calls 'the revolt against the village, the attack on the country mind, [the] savage repudiation of the old pieties' (Hofstadter: 287). In the national-class vision, Main Street could do nothing right: 'Her factories [are] ghastly, her shops tawdry, ... her aesthetics infantile, ... her people fried-suppered' (Owens: 513-15). Cosmopolitan advertisers urged consumerism as the path to a more 'urban' and 'modern' society, assisted by agricultural extensions at state universities that preached new practices of modern work and consumption to farmers and other rural Americans (Barron: 193-94).

These rural and small-town Americans, for their part, frequently resented this incursion of 'modern, urban' values into 'traditional' culture. They selectively adopted elements of modern culture (such as the automobile) when such innovations fitted their needs and lifestyles, but remained wary of what they often saw as the degeneracy and immorality of the city, and understandably bristled at being regarded as 'rubes' and 'hicks' by their urban compatriots. Feeling that their traditional (white, Protestant, patriarchal) values were under threat, some turned to increased racism and religious fundamentalism, which served to further confirm the national-class stereotype of rural folk as pre-modern troglodytes. While 'national unity' was an idea that nearly all Americans could endorse in the early twentieth century, they did so without ever agreeing on what it meant. Very different approaches to modern life and very different visions of the nation competed politically, economically, and culturally during the 1920s.

Radio promised to fulfil the nationalizers' modernizing purpose like no other form of communication. Socially constructed for twenty years as the pinnacle of modernity, part of radio's mystique was its ability to overcome the social limitations of pre-modern life, transcend distance, and connect remote local communities and isolated individuals with the greater social body. The teleology that was constructed for radio was to eliminate the local as a determining factor in American life: one might not be able to easily leave one's locale in a physical sense, but radio enabled the listener to transcend locality both socially and culturally. Such discourses posited an 'excess' of localism in rural America as a kind of disease for which national radio provided the cure. As an article in *Wireless Age* predicted, in arguing that urban cultural fare would 'emancipate' Main Street from the mental bondage of vulgar localism: 'The small village of the past, with its warped outlook on life, its ignorance of current events, its mean and petty superstitions, is in a line to be completely "revamped," as it were' (qtd. in Patnode: 298).

Similarly, the president of RCA argued that national radio's greatest benefit lay in bringing urban culture to rural America: 'The farmhouse is in touch with city life; its isolation has forever gone. ... Whenever there is something of unusual interest in the distant city, [the farmer] may be fairly sure that the grouping of stations will bring the event to his sitting-room' (Harboard). David Sarnoff spoke of 'keep[ing] the remotest home in the land attuned to the thought and doings of the great world outside' (Sarnoff 1924a), while other industry insiders praised network radio for making the 'talent of our great cities available everywhere' ('Report': 13). Such observers naturally betrayed their national-class prejudices in presuming that the provinces would want nothing more than to listen to the cosmopolitan tastes and going-ons of the city.

Although representatives of the traditional local middle class dominated Congress and the White House during most of the 1920s, most early radio regulators, like the most powerful figures in the industry, were clearly aligned with the national class and stood philosophically and politically behind its modern, national vision. In part this was biographical: unlike Congressmen who can easily rise to power by aligning with the interests of local elites and opposing the federal culture and values of 'Washington', Hoover and other policy-makers were selected for their ability to integrate smoothly into the bureaucratic, technocratic, translocal universe of modern national governance. Although some of the top Radio Division and Federal Radio Commission personnel, including Hoover, originally came from relatively small towns, by the time they reached the Commission they were seasoned cosmopolitans far removed from quaint notions of the small town and the local community: big-city broadcasting executives and globetrotting engineers and influential New York editors. Once in power, they exhibited little of the provincialism of whatever small-town roots they may have carried with them, and even occasionally gave in to Mencken-style anti-localism, as in a chummy note from one radio

commissioner to the president of NBC in which he sarcastically grouched about the 'important problems' on his desk, 'such as whether Henry Field at Shenandoah, Iowa, should be allowed a radio station to advertise the price of a fresh consignment of prunes' (Saltzman).

More important than biography, however, was positionality: these regulators' view was from a federal perch, and their responsibility was not to accommodate national projects to local idiosyncrasies but rather to subsume and level out local conditions within an efficient and rational national system. As Wiebe argues, 'During the 1920s the very meaning of public policy changed to take on broad responsibilities for a smooth running, comprehensive economy', of which radio was an increasingly important part (Wiebe: 209). Localism for most of these regulators was not a value to be nurtured and protected from the modern world, but an obstacle to be overcome in exercising the power and duties of their offices. Thus, Hoover himself frequently insisted that 'radio will not have reached its full service' until a national radio system was in place (Hoover 1924a). His goal was to establish a system within which 'radio fans may receive an even more vital contact with our national life; that is, to receive constantly improving programs of entertainment, larger participation in the discussion of public questions, in vital events and important news' (Hoover 1924c). In this model, the power and benefit of radio was not for the local to express itself, nor for the national to listen to the local, but for the local to listen to the national, making radio an ally of a national culture centred on cosmopolitan values in the struggle between localism and modernity. The national interest, rather than small-minded local concerns, should therefore guide radio policy. As *Radio Broadcast* put it, 'Radio is too large a force to deal with the many petty social and political differences of village and town—it deals with matters of state and nation, with matters of international importance' (McKibbin: 238). The point was not to put an urbanizing society back in touch with its rural, small-town roots, but

to spread urban, cosmopolitan culture and attitudes throughout the land; it was, in other words, to integrate the local into the nationalizers' modern nation.

Facts on the ground, facts in the air

When broadcasting emerged unmistakably in the early 1920s, regulators found their manoeuvring room severely constricted by already well established facts on the ground. In particular, a thriving amateur sector had rebounded vibrantly from its wartime hiatus and successfully organized to resist continued centralized governmental control of radio. As a result, unlike Great Britain and other war-torn European countries, broadcasting in the United States arose under a regulatory regime based on individual licensees with the expectation of First Amendment rights.⁶ The Commerce Department originally put all news and entertainment broadcasters on the same wavelength of 360 metres, making no distinction between "local" and "national" stations nor expressing any concern about service to local communities.⁷ Importantly, however, these individual licensees were of varying solvency and technical capabilities, and the disparities among broadcasters only grew throughout the 1920s through a combination of market forces and monopolistic practices, such as the refusal of RCA to sell certain transmitting equipment to independent stations—equipment that would have increased the signal quality and service range of those stations (Douglas: 315-16; Doerksen: 38-39). As a result, the radio landscape during the 1920s was populated by a mushrooming number of individual stations distributed unevenly (and, one might say, unequally) throughout the country. When Commerce officials finally began dividing these broadcasters into policy categories in 1923, they did so

⁶ For more on the post-war struggle to control radio, and the role of amateurs in asserting private-sector rights in the ether, see Slotten, pp. 51-61.

⁷ One early Commerce memo, far from expressing concern about affirmative localism, even boasted of the ease with which Pittsburgh's KDKA could be picked up in Washington, D.C. as evidence of the success of Commerce's broadcasting regime (Carson).

without any reference to the need for "local" and "national" service.⁸ Instead, they used distinctions in programming quality to grant certain privileges to wealthier operators. For example, stations that could afford to transmit live programming exclusively were allowed to become 'Class B' stations, enabling them to switch to a less crowded frequency and increase transmitter power. Poorer stations, including those that relied even occasionally on phonograph records, were left at 360 metres with lower power and more interference, often effectively limiting their listenable range to a few miles in any direction, i.e. their 'local' community.

What was emerging was a kind of 'class-localist' system that made it increasingly difficult to separate a station's economic and social standing from its broadcasting range and programming function. A discourse of 'local' and 'national' stations arose to explain and justify these trends, eased by national-class associations of the local with inefficiency and cultural degeneracy. Wealthier broadcasters began arrogating the term 'national' for themselves as part of their commercial ambitions, as when RCA's David Sarnoff told the Third Radio Conference in 1924, 'The local station is interested in maintaining the interest only of its local audience, and therefore has no need for higher power' (Sarnoff 1924b: 44). General Electric's Director of Broadcasting articulated this emerging dichotomy even more explicitly:

[A] department store or a local newspaper in Natchez, Mississippi, can have very little interest in broadcasting to Portland, Ore. Thus, three years of broadcasting have resulted in a rough classification of stations, local and general, the former being of interest in a limited range and the latter having national or, at times, international interest. The future will probably see this principle more generally recognized and if so, unwise investment in broadcasting apparatus will be saved and the problem of allocation of wave lengths will be simplified (qtd. in 'Suggests': XX14).

⁸ As Marvin Bensman put it, 'Europe allocated frequencies by area while the United States assigned frequencies according to the service provided' (Bensman: 70).

This 'rough classification' was, critically, an informal process by which 'local station' gradually became a label retrofitted onto poorer, lower-powered stations to legitimate their increasing marginalization within the system as a whole. In other words, the 'local station' was not originally the formal creation of regulators attempting to preserve space in the system for local service, but a common-sense understanding of a stratified broadcasting system that helped justify discriminatory treatment of small stations in favour of larger, ostensibly 'national' ones.⁹ As one industry insider expressed this understanding, comparing poorer local stations to kids on roller skates out on the highway, 'The little local fellow may have his small place in the sun, but he must be contented to occupy a very small place indeed and not to put out too many claims as to his supposed rights in radio' (Neely: 27). Of course some lower-powered broadcasters were indeed content with this state of affairs, in part because their primary mission was to provide locally originated programming to a local service area, and so they truly saw no need for higher power. But many others, whom economic limitations and unfair trade practices had consigned to low power and cheap programming, suddenly discovered that they were 'local stations' whether they liked it or not. The key point is that, long before 'local station' became a fully operative policy category, large corporations and a national-minded Commerce Department had already effectively imposed that status on hundreds of smaller broadcasters. In that sense, 'local station' was an *economic* category prior to becoming a *regulatory* one, an inequality in the media system that found retroactive justification within the national-class world-view rather than the conscious product of policy decisions designed to promote and preserve local identities and local public spheres.

⁹ That these terms were more legitimating than descriptive can be seen in the fact that, despite RCA's best efforts to create 'super-powered' stations reaching the whole nation, no stations served the entire country, with even the most powerful attaining a reliable listening radius of around one thousand miles. For more on RCA's pursuit of 'super-power', see Smulyan, pp. 44-48; Socolow, pp. 30-32.

The so-called 'chaos'¹⁰ on the airwaves that led to the 1927 Act might have provided the pretext for a radical redesign of American broadcasting to mitigate some of these disparities. But despite being prepared to eliminate hundreds of (mostly low-wattage independent) stations to deal with the grossest inefficiencies,¹¹ regulators were less fond of the idea of totally revamping the system despite occasional congressional pressure to do so.¹² As the month-old FRC wrote in its 'Plan of Procedure', '[I]t is not advisable ... to tear down the whole structure of frequency assignments built up during the past six years, and to attempt arbitrarily to create an ideal broadcasting situation by an entirely new allocation of frequencies' (FRC 1927b). In point of fact, of course, as political pressure intensified the following year, a new allocation *did* occur: some 94 per cent of spectrum assignments were affected by General Order 40 in November, 1928 (McChesney: 25). But that reallocation, while evening out the grossest of the regional disparities that had grown up over the decade, merely rationalized and reified the existing system by formalizing the existing class-localist schema.¹³ To be fair, the 1927 Act did not encourage radical action (Streeter: 96). But at the end of the process, small broadcasters, now officially categorized as 'local stations', were more disadvantaged than ever before, forced into

¹⁰ Recent scholarship has begun to question the extent and intractability of the chaos on the airwaves that led to the 1927 Act, arguing that a variety of factors—not simply the overcrowding of the spectrum—led to the reception problems of the late 1920s. This view casts into doubt the necessity of later FRC actions eliminating dozens of stations. See for example Phipps (2001); Hilmes (2003).

¹¹ 'The Commission recognizes that no scheme of reallocation which does not at the very outset eliminate at least four hundred broadcasting stations can possibly put an end to interference' (FRC 1927a: 13).

¹² For example, Rep. Tom D. McKeown (D-OK), argued for a *tabula rasa* approach in early 1926, saying, 'There ought to be an entire new deal regarding these wave lengths' (qtd. in 'Bill Provides': XX15).

¹³ The FRC was already nervous enough about wholesale denial and reassignment of licenses; totally revamping the system was out of the question. As Commissioner Eugene Sykes explained the situation to Congress in 1928, "[I]f we had denied 150 or 200 station licenses at that time, in my judgment and in the judgment of the Commission, we would have had so many law suits and possibly temporary injunctions granted against us that practically the whole of the broadcast band would have been tied up" (United States Congress 1928, p. 3). It should be remembered, too, that the newly created FRC was a politically weak body with only three out of five Commissioners appointed, a one-year lease on life, no funding, no office space, no support staff, and many of the necessary advisory and supervisory functions still housed in Commerce. Under such circumstances, it is nearly inconceivable that they would do more than tinker at the edges of the system they inherited, especially in the absence of a mandate to implement more radical restructuring.

uneconomical time-sharing agreements and placed on the worst wavelengths. In that sense, the circle was now complete: the notion that poorer stations were 'local', and therefore did not need or deserve decent spectrum assignments, became a self-fulfilling national-class prophecy. Many 'local stations' survived, albeit within a now fully entrenched hierarchical structure of 'local', 'regional', and 'national' stations.

Using localism to control content

Regulators used discourses and structures of localism to balance a range of political and social pressures bearing down on them as they worked to shape the radio system according to their national priorities. A tangle of often opposing factors influenced policy, whether due to the threats and desires of different Congressional factions; issues of technological, legal, or political feasibility; or conflicting opinions from the public voices and experts who had the regulators' ears. Regulators were caught in often-impossible binds, certain to anger someone no matter what they did or did not do. The rhetoric of localism helped regulators navigate these competing demands, justifying their decisions as they attempted to modernize the country through radio.

One of these key areas was the realm of content control, specifically the tension between the perceived need to control the material being broadcast and the power that government could or would exercise to achieve that aim. Americans in the 1920s had few doubts about the power of the radio, and many feared radio's potential for subversion or corruption should broadcasting fall into the 'wrong' hands. As one interested broadcaster wrote to Herbert Hoover, her charming syntax belying her anti-Semitic and anti-immigrant attitude:

It would be a thousand pities, -- would it not? -- if radio, this newest and super-force, -- should be turned over to the man-in-the-street, -- as we have already turned over our moving pictures, many of our newspapers and much of our literature -- (so-called.) To all who truly want to preserve and to cherish our Anglo-Saxon civilization, such a possibility is unthinkable (Benedict).

Such sentiments were echoed repeatedly by listeners and social critics, inspired in part by the example of the BBC and other European systems that firmly excluded undesirable voices from the airwaves (see, for example, Hilmes). As Susan Douglas writes, 'Implicit in virtually all of the magazine articles written in the early 1920s about radio's promise was a set of basic, class-bound assumptions about who should be allowed to exert cultural authority in the ether' (Douglas: 313-14). Douglas may be overstating how clear those assumptions actually were, since there appears to have been little agreement on exactly whose hands were the wrong ones—Jews, Catholics, immigrants, Bolsheviks, evolutionists, snake-oil salesmen, persons of questionable moral standing, and vulgarians of all stripes¹⁴—but her larger point about class-bound anxieties is certainly correct. These fears inevitably found expression at the federal level, as listeners, lawmakers, and advocacy groups turned first to Commerce and then to the FRC to put radio into the 'right' hands. The acuteness of these concerns can be seen in the degree to which Hoover and other regulators felt compelled to reassure the public that they would safeguard the home from the invisible filth and subversion that could potentially emerge from the Radiola. Hoover expressed early and often his determination not to let radio fall into 'uncontrolled hands' (Hoover 1922: 3). As he argued in his address to the Third Radio Conference, 'It is not the ability to transmit but the character of what is transmitted that really counts' (Hoover 1924b: 2). Hoover reminded attendees that radio had 'reached deep into the family life', making it unique among Commerce's responsibilities; he promised: 'We will maintain [radio activities] free—free of monopoly, free in program, free in speech—but we must also maintain them free of malice and unwholesomeness. ... We can protect the home by preventing the entry of printed matter

¹⁴ For a discussion of some of these concerns, see Goodman and Gring, especially pp. 408-09; Murray.

destructive to its ideals, but we must double-guard the radio' (Hoover 1924b: 2). Clearly he felt that some form of content control in broadcasting was necessary.

Nonetheless, Hoover had little desire to become the Comstock of the wireless. As the above quote suggests, Hoover was a firm believer in the ability of government and business to work together to their mutual benefit, an approach that he had pursued from the beginning with the radio industry.¹⁵ Furthermore, government censorship or ownership of broadcasting stations faced strong opposition within the government, industry, and much of the public. On the one hand, the 1920s were witnessing what Paul Boyer has called 'the onslaught against federal censorship' as the vice societies, social-hygiene movements, and censorship campaigns that had arisen in the nineteenth century and flourished throughout the Progressive era began to face popular backlash and legal defeat (Boyer 2002: 207, 143). On the other hand, as Michele Hilmes has demonstrated, an ideologically-inflected structuring opposition to Great Britain's public service system worked to construct private enterprise and First Amendment rights as particularly American virtues integral to US radio, even as both systems sought to remove broadcasting from 'popular' (i.e. uncontrollable) hands (Hilmes: 3). The 1927 Act sealed this backlash by forbidding direct governmental censorship of radio, which left the FRC caught between an ideological imperative to guarantee 'safe' content in radio and a legal prohibition on official content control.

The FRC responded to this bind in various ways relevant to a discussion of localism, most significantly by using localist rhetoric to advance *national* radio standards in its statements and licensing decisions. The effectiveness of discourses of localism in justifying and legitimating policy decisions derived in part from their appeal to the traditional local middle class, the power base of the Congressional majority. Commissioners were able to draw on these discourses as

¹⁵ For a full discussion of Hoover's political philosophy and its effects on his stewardship of radio policy, see Streeter.

needed, but that did not necessarily translate into structures and decisions that furthered local identities and local public spheres.

A key example of this process at work is the FRC's promulgation of national programming standards; specifically, the FRC promoted a definition of appropriate content that *seemed* to champion localism but in fact worked to erase local distinctiveness. This was the 'general interest' content standard enunciated in the Great Lakes decision that required a broadcaster to serve 'all substantial groups' in his listening area:

[T]he tastes, needs, and desires of all substantial groups among the listening public should be met, in some fair proportion, by a well-rounded program, in which entertainment, consisting of music of both classical and lighter grades, religion, education and instruction, important public events, discussions of public questions, weather, market reports, and news, and matters of interest to all members of the family find a place (FRC 1929: 34).

This ideal 'well-rounded program' was contrasted with the offerings of 'propaganda' broadcasters, by which the Commission meant stations serving as a 'mouthpiece' for a particular religious, political, social, or economic 'school of thought'. These propaganda stations ostensibly did not have 'the standing and popularity with the public necessary to obtain the best results in programs of general interest', and were therefore to be discouraged. The major problems inherent in this definition of appropriate content should be readily apparent: obviously the FRC was attempting to marginalize a wide range of American thought and experience in radio and enforce a narrow, centrist programming style reflecting the tastes and sensibilities of white, cosmopolitan elites. More pertinently, however, although this definition certainly sounds like a localist policy in championing the needs of local communities, it enabled the FRC to suppress local particularities. Indeed, if looked at from the point of view of a regulatory mandate to control content on hundreds of stations in a diverse nation, we begin to see how the FRC's definition of desirable programming in fact imposed a generic, *national* standard on broadcasters that sought to flatten

out local differences. It provided a template that every community was required to fit, while any *actual* local uniqueness of character risked official sanction.

First, the FRC's content expectations worked to erase differences within communities. Numerous observers have remarked that localism, especially in terms of a spatially defined 'local community', suffers from numerous conceptual problems, among them that it works to silence important differences within a geographic locale such as class and race.¹⁶ Without rehearsing those arguments here, it is fair to say that, despite the rhetoric of local service, the FRC was unconcerned with such differences within a community, promoting programming standards that only nominally valued the idea of diversity. For example, when Newark's WNJ found itself challenged for its spectrum assignment, the FRC described WNJ's specialized programming for the many different communities in its service area: 'Much of the station's program time is devoted to matters of interest to foreigners, including Lithuanians, Italians, Germans and Hungarians, and there are broadcast many programs of particular interest to colored people. Many of the announcements and programs are given in foreign languages' (FRC 1931b). Nonetheless, the Commission suffered no apparent cognitive dissonance when it deleted WNJ with the argument that 'no substantial broadcasting service not otherwise available' would be thereby eliminated. Given that this case concerned the New York metropolitan area, it is conceivable that the Lithuanians, Hungarians, and other ethnic communities of Newark did indeed receive programming intended especially for them from another nearby station (although the FRC's report does not mention any such alternatives in justifying its decision). But even if that was the case, WNJ was not an isolated incident, and this lack of concern with specialized

¹⁶ See, for example, Newton, especially pp. 19-23.

local programming catering to 'all substantial groups' in a given locale occurred consistently throughout the FRC's tenure. Such cases include:

- a Philadelphia foreign-language station with programs in Italian, German, and Polish that was denied more power because 'it does not appear ... that there exists a need for additional radio service in any of the metropolitan area of Philadelphia' (FRC 1931d)
- a black newspaper in Kansas City, Missouri that was denied a license to build a station for African-Americans 'to broadcast the spiritual side of negroes', in part because 'Kansas City is already well supplied with stations' (FRC 1930)
- applicants proposing a Japanese-language station in Honolulu who were rejected because, even though 38 per cent of Hawaiians spoke Japanese and no non-English programming was aired in Hawaii, 'It is not shown ... that there exists a need for additional radio broadcasting service in the area' (FRC 1931c).

Whatever the other merits or shortcomings of applications like the ones above, it is apparent that the FRC was not especially interested in the needs and desires of diverse local groups of listeners, but rather in the imposition of relatively rigid programming standards on communities regardless of the divisions within them. Indeed, a licensee had little to fear if his program service failed to reflect and nurture local identities (as long as his operations were solvent): in a study of 180 application decisions prepared by FRC staff in 1931, poor local programming was the sole cause for a broadcaster to lose his license in just one case (Fisher). When it came down to it, all the local service in the world would not get you a license if the FRC did not trust your solvency, while poor local service by itself almost never cost a licensee his privileges.

If there is scant evidence that the FRC cared much about diversity *within* a local community, there is equally little reason to believe that the Commission was too concerned with differences *between* communities either. For example, the FRC approved the removal of a station from Moorhead, Minnesota to Duluth, reasoning that Moorhead was adequately served by a station in Fargo, North Dakota (just across the Red River). In other words, for the FRC's purposes, Fargo and Moorhead were essentially the same place, even though they are in different

states. Unsurprisingly, Moorhead's citizens saw the situation differently and protested vehemently, arguing that the two cities had distinct political, economic, and social identities and needs: Fargo's station reflected (at best) Fargo's and South Dakota's social and political life, not Moorhead's and Minnesota's (Porter). Similarly, the FRC treated cities and their suburbs as one locale, even though urban centres often have very different needs, tastes, and concerns than their suburban satellites, and local suburban advertisers often could not afford to advertise on the city stations. For example, an applicant in Jeannette, PA, a suburb of Pittsburgh, hoped to offer an alternative to the Pittsburgh stations that were 'not altogether suitable advertising outlets for many of the merchants in the Jeannette area who are interested in and might patronize a local station' (FRC 1932a). The FRC denied the application, arguing that Jeannette was already well served by the Pittsburgh market. The Commission made the same point even more forcefully in the case of an applicant from Greensburg, PA, about twenty-six miles from Pittsburgh:

There is no ... station licensed to operate in Greensburg, but this community and its neighboring communities appear to be well within the service range of broadcasting stations located in Pittsburgh. ... The evidence shows in this connection that Greensburg and the other communities nearby are all definitely a part of what is generally known as the Pittsburgh area (FRC 1933b).

By ignoring such differences between localities, the FRC demonstrated little sensitivity to local identities—the very opposite of affirmative localism. While it is understandable that not every suburb or small town could get its own radio station—especially since the FRC had allocated just six national frequencies to local stations¹⁷—the refusal of the FRC to even acknowledge these local differences seems to undermine any claim that regulators held any great brief for localism. Furthermore, such media policy decisions, together with other nationalizing trends, were effecting a spatial reorganization of the nation into more efficient, centralized structures, such

¹⁷ In the early 1930s, less than half the United States (by area) received 'primary' (i.e. groundwave) radio signals. Put another way, some 21 million people had no 'local' stations of any classification whatsoever. See. Russo, p. 26.

that towns that were formerly merely near Pittsburgh were increasingly becoming part of 'the Pittsburgh area'.

To further demonstrate that the FRC's 'local' content requirements advanced a singular national programming standard at the expense of even modest diversity, consider the examples of two typical religious broadcasters who wished to provide local programs to their communities. The first was WMAY, a local station owned by a Presbyterian church in St. Louis. Its license renewal in 1931 was a complicated affair, but the upshot was that the FRC, drawing on its 'all substantial groups' standard, used the station's religious programming to accuse it of providing poor local service: 'The programs broadcast by Station WMAY, have not been varied or designed with the purpose of rendering a complete broadcasting service and one which would appeal to substantially all classes of the listening public' (FRC 1931a). The church's applications were denied and WMAY was deleted.

In itself this is unsurprising: it is no secret that the FRC did little to encourage religious broadcasting in the United States, and the WMAY case merely illustrates how programming standards to serve a posited 'local community' helped the FRC justify the repression of 'propaganda' stations. But the second example shows how, if the FRC thought a licensee was too far outside the mainstream, the same standard could work the other way. Pillar of Fire is an evangelical Christian church that wanted to build a station in Cincinnati, where it owned a school and nurtured a small community of adherents. The church was solvent, both Ohio and the Second Zone were under quota,¹⁸ and unlike WMAY, the church promised to offer 'a well-

¹⁸ Under the 1928 Davis Amendment, requiring equalization of radio facilities among the various states and the five radio zones, the FRC assigned each state and zone a quota representing its share of total broadcasting facilities. A new broadcaster or a station that wanted to increase its power in an over-quota state or zone was required to identify another station whose facilities should be correspondingly reduced so as not to go further over-quota. A comparative hearing then established who was better qualified to broadcast in the public interest. An application for facilities in under-quota areas, however, was allowed to simply ask for the available facilities.

rounded program' that nicely approximated the FRC's definition of appropriate content, including music, educational lectures, dramatic pieces, etc. They even planned to allow other groups to use their facilities, including schools of music, choirs, dramatic organizations, and other churches. In this case, the FRC denied the application, but not because Pillar of Fire wanted to run a predominantly 'propaganda' station—at least not officially. Rather, the given reason for denial was that *the church wanted to run a predominantly general interest station*. Here is what the FRC wrote in its grounds for decision:

1. Cincinnati and vicinity now receive good broadcasting service from a number of stations located therein ... and it does not appear that there is a need for additional service in that area.
2. Satisfactory showing is not made that ... the character of the service rendered would be materially different from that now received in the Cincinnati area (FRC 1932b).

In other words, to be a viable applicant for a broadcasting facility, Pillar of Fire was required to promise roughly the same type of programming as every other station in accordance with the FRC's stated wishes. But when it proceeded to do exactly that, its application was rejected because its programming would not be different enough from the other stations in its locality—a textbook Catch-22.

The case points to some of the unpredictable ways that content control and localism interacted. For the FRC, as long as listeners in a given locality could receive one or two 'general interest' stations, the radio needs of that community were considered to have been met—an ethic that might be summarized as 'any (non-propaganda) radio is good radio'. But what was really at stake was the use of discourses of localism—that is, discourses that looked and sounded like the encouragement of distinctive, community-based programming—to impose a nationwide programming norm on local radio, eliminating locally distinctive points of view, flattening out

local differences, and championing the kind of national-class radio fare that urban cosmopolitans tended to prefer. It has often been noted that geographic-based localism ignores ways that people construct their identities besides (or in addition to) attachment to a local sense of place. But officials were not blind to ways of addressing people other than in terms of local identities; instead, they encouraged 'local identities' because the FRC's 'efficient', one-size-fits-all standard helped contain less controllable and potentially more threatening modes of address. This pre-1935 use of localism imposed a nominal geographic purpose on radio (serving all 'substantial'¹⁹ groups within a local community, as opposed to other possible purposes for broadcasting) while in fact advancing programming that suppressed local particularity and diversity.

Local trusteeship, national control

In addition to programming standards, regulators also achieved content control by using the rhetoric of localism to delegate legal responsibility for programming onto individual licensees and positioning local audiences as the supposed guarantor of licensees' performance. This is the model known as local trusteeship, described by Thomas Streeter as 'a fiduciary responsibility to serve the public interest more than a right to broadcast or a right to ownership of a channel' (Streeter: 97). As regulators saw it, charging individual stations with content control provided a means for keeping licensees in check without direct government censorship. Localism entered into the trusteeship model by nominally making the local audience the primary policing agent for radio content, an idea that satisfied traditional middle-class notions of the 'local' as the key site of social control. As Commissioner Henry A. Bellows articulated the trustee-community relationship in a speech before the League of Women Voters, 'It is for you to establish close

¹⁹ The FRC gave no guidance on when any given group within a community should or must be considered 'substantial' enough to merit programmers' attention.

relationships with the broadcasters who serve your communities, and to show them that it is to their advantage to use their station for the highest type of public service' (Bellows).

But though again couched in the language of a licensee's responsiveness to his local community's needs, the effectiveness of the local trustee model depended on a single national standard of appropriate content: at the end of the day, it was the FRC that could revoke a license and thereby establish the boundaries of safe programming regardless of local community standards. In fact, listeners were not even granted legal standing to challenge licensing decisions until 1967, effectively eviscerating meaningful accountability to local audiences (Classen: 79-80). This is not to say that local trusteeship was a fiction—listeners did play a modest role in providing the FRC with feedback on licensee performance, although this role was itself striated by class and other axes of social status, and Commissioners routinely ignored petitions and listener letters that supported or opposed a given application. Here, too, national-class commitments to efficiency and modern rationality came into play: actually attending to listener and other 'non-expert' feedback, and incorporating it substantively into the decision-making process, was considered a waste of time for the over-strapped Commission. Thus there remained a significant structural imbalance between the power of listeners to bring content-related complaints to the FRC and the power of the Commission to take any or no action in response to those complaints. Content control was nominally farmed out to the broadcaster's public, but the real power to determine acceptable programming was retained by national-class-minded regulators in Washington.

In that sense, the local trustee model was less a nostalgic attempt to bring back small town surveillance or encourage programming that reflected community needs than a rhetorical strategy using the discourse of localism to situate listeners at a specific point within the policy

field: the empowered position of censor that neither the government nor the private interests who controlled content could legitimately, officially occupy. The result was intense pressure on licensees to air programming that pleased the FRC and national-class critics, not necessarily programming that *actually* reflected the diverse tastes and desires of their local listenership.

When a generic, national standard of radio is defined as responding to local community needs, and the community's own expression (however partial and distorted) of those needs is routinely ignored, there is more going on than an anachronistic longing for small-town life or even concern with the economic well-being of the industry as a whole. Regulators before 1935 did not use localism to encourage local difference or to give expression to local identities. Instead, it used localism to tie localities into national-class standards of broadcasting throughout the radio system. This interpretation also accords with regulators' sympathies for commercial radio that encouraged new practices of consumption as the heart of modernization itself. Thomas Streeter has pointed out that broadcasting began as a challenge to the corporate order: anarchic, geographically dispersed, and run by and for amateurs. If, however, its structure could be rationalized and its diversity controlled, 'the possibly of a radio set in every home presented new opportunities for integrating everyday life with the corporate order' (Streeter: 86). In part, this integration simply meant modernization through the sales of actual products. For example, Hal Barron has shown the ways that radio advanced an ideology of 'modernization' in rural America, a vision that included electricity, indoor plumbing, and various appliances like refrigerators and radio itself (Barron: 213). But integrating everyday life with the corporate order also meant inculcating new purchasing habits and new attitudes toward mass culture, encouraging Americans to see themselves as 'consumers'. In particular, it meant overcoming ideological resistance to consumerism among rural Americans, the attitude that, 'If people couldn't get along

without luxuries like bathrooms they'd better quit farming and move to the Waldorf-Astoria' (qtd. in Barron: 213). By using the rhetoric of localism without actually promoting or rewarding localism in an affirmative sense, regulators could shape radio to bring their vision of modernization from the cities to the country. The effect was to advance a uniform national consumer culture based on the needs of a translocal corporate economy and on the tastes and desires of cosmopolitan elites at the expense of local distinctiveness.

How intentional was this modernizing project? Although policymakers in the 1920s and early 1930s could not necessarily foresee the ultimate effects of their decisions, I contend that they quite consciously privileged national-class values and interests, and largely succeeded in building them into the foundations of the media system. In fact, the FRC itself made my argument better than I could, as when Commissioner Harold Lafount summarized the FRC's accomplishments, boasting:

National unity has been promoted, musical culture and appreciation widely extended, messages of men and women of outstanding achievements and mentality are now heard by millions through the networks, geographical provincialism is being banished rapidly, thus preventing the disintegration of our vast population into classes. Common sources of entertainment, common economic interests, common ideals ... constitute bonds for making our people homogeneous (Lafount).

It could hardly be stated more clearly. The FRC was not interested in preserving local idiosyncrasies and identities. Rather, it was interested in using its own narrow definition of 'culture' to promote national unity, banish provincialism, and make 'our people' homogeneous—on the national-class's cultural and economic terms. Localist discourses and structures proved useful in this project, but the 'bedrock concept' of encouraging local identities and local public spheres really had little to do with it.

Conclusion

After 1934, the FCC did indeed begin to encourage affirmative localism, something that Commerce and the FRC never did. They revisited the issue of spectrum allocation with an eye toward reducing the number of clear channels, and they began emphasizing local origination in their programming standards. There are various reasons for this 'turn to localism' in the late 1930s: the return to power of Progressive-minded reform groups such as women's clubs; a reevaluation of Progressive-era social policy following a period in the 1920s and early 1930s in which Progressivism was widely discredited; the national class's own growing discontent with the homogenizing and standardizing impulses of corporate culture; the continued consolidation of network power in the radio industry and the further erosion of the non-profit sector after 1934; clashes of interest between networks and local stations; a new generation of regulators steeped in New Deal ideology who were less invested in Hooverian associationalism and more invested in structural remedies to industry inequalities; and the depth of the persistent economic crisis that threw into question the modern, corporate, national-class social vision that drove the FRC.

But whatever the reasons for this late-1930s turn to localism, I hope to have shown that it was not a 'return to localism'. Although the FRC found localist discourses useful in its explanations and justifications for its policies and decisions, localism as it would come to be understood by the Commission—i.e. affirmative localism—was not a goal of regulators prior to 1934. Instead, the FRC pursued an economically stable, ideologically safe, modern corporate broadcasting system for the nation. And as regulators who later tried to reform that system to incorporate more affirmative localism discovered, the FRC did their work all too well. Media in the United States would re-localize in particular ways at different times over the coming decades, often at moments of technological change such as the rise of FM or cable television, but the nationally oriented commercial system was here to stay.

I see several lessons to be drawn from this study. First, it encourages us to avoid jumping to conclusions about the historical workability of localism: rather than dismissing it as something that was tried and found wanting, we should recognize that regulators did not actually attempt to foster affirmative localism until more than fifteen years into the broadcaster era. Indeed, if they had, the history of American media might look very different today. Instead, 'local stations' were economically disadvantaged from the outset, a condition exacerbated by national-minded policy decisions, and if subsequent attempts to privilege localism largely underwhelm, I believe that reflects not a problem with the concept itself so much as the difficulty of altering an entrenched media system founded primarily on other values. Second, whatever one thinks of the FRC's goal of stitching the nation together through an elite cosmopolitan style of national radio (with its concomitant reliance on advertising and chain broadcasting), the FRC's relative success in pursuit of that goal despite enormously trying circumstances should be acknowledged, and that body's long-standing reputation for incompetence and cowardice—as well as the degree of regulatory capture that structures the media system—accordingly re-examined. Finally, this study reminds broadcast historians to keep in mind the important distinctions between media policy and the discourses that support and justify that policy. In other words, rather than asking why localism did not do what we imagine it was supposed to do, it pays to ask what exactly localism was supposed to do and why.

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