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Transparency in Political Advertising: Assessing the Utility and Validity of the FCC's  
Online Public Inspection File System

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# TRANSPARENCY IN POLITICAL ADVERTISING

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## Assessing the Utility and Validity of the FCC's Online Public Inspection File System

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### ABSTRACT

This research explores the usability of the Federal Communication Commission's (FCC's) online Public Inspection Files to measure the sources and quantities of political advertising on broadcast television. We compared data from FCC files with data purchased from a commercial vendor in a presidential caucus campaign that stretched across nine months, including advertising sponsored by over 40 groups and totaled tens of millions of dollars. The FCC-derived and commercial data were consistent in reporting the quantity of advertising, but sponsor identification was inconsistent between data sources, raising concerns about the FCC's ability to disclose reliable information about political ad spending.

Keywords: political ad spending; transparency in election spending; FCC data policy; FCC online public inspection file system

The US Supreme Court decision in *Citizens United v. FEC* sharpened concerns about the dominant role that corporate wealth and special interests can play in the electoral process through financing political advertising.<sup>1</sup> The *Citizens United* ruling invalidated parts of the Bipartisan Campaign Finance Reform Act (2002) and was contrary to the Court's previous decisions in *McCormack v. FEC* and *Austin v. Michigan Chamber of Commerce*. Although the Court's decision in *Citizens United* found restrictions on the amount of corporate spending on election campaigns to be unconstitutional, it let stand disclosure provisions in order to provide information to voters. Consequently, the quality of publicly accessible data about political advertising is of critical importance to understanding

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1. See Blevins; Levi; and Levitt.



the role that corporations and other private interests play in the electoral process.

One of the remaining forms of public oversight of financial influence<sup>2</sup> in political advertising is the FCC's requirement that broadcasters disclose information about their political ad sales through each broadcast station's online Public Inspection Files. It is important to more fully understand the accessibility and accuracy of this information.

The study that we present here focused on advertising during the Iowa caucuses to test the usefulness and validity of the FCC Public Inspection Files as a source of political advertising data. We compared data derived from the FCC with data purchased from a commercial vendor, Kantar's Campaign Media Analysis Group, for \$19 million of advertising spending over 9 months by 40+ political advertisers. This is the first comprehensive, peer-reviewed study of FCC-derived data and offers critical insights for public interest groups, campaign finance reform advocates, and media researchers.

### Measuring Political Advertising: Federal Election Commission, Kantar, and the FCC

For media researchers and public interest groups, the usefulness and validity of political advertising spending measures are both key factors to understanding the power that money plays in the election process. Although there are multiple sources of data for researchers to collect political advertising data, including two federal commissions and a private company that tracks political advertising, there are significant limitations to each, including lack of detail, cost, and usability of the data. In this section, we examine how the Federal Election Commission (FEC) and Kantar Media's Campaign Media Analysis Group measure political advertising in election campaigns and the limitations of both sources. Additionally, we explore the potential for the FCC's public file system as a free alternative source of data for researchers who want a detailed gauge of spending on political advertising. Table 1 provides a comparison of the three sources by data origins, units of analysis, media covered, media not covered, costs, and timeliness.

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2. Financial influence may come from a variety of sources, including corporations that form traditional PACs, as well as wealthy individuals who are making the donations to super PACs and 501c organizations.

TABLE I Political Advertising Data Suppliers

	FEC	Kantar	FCC
Message source	Candidate committees, political action committees, and other groups	Candidate committees, political action committees, interest groups	Candidate committees, political action committees, interest groups
Advertising quantity	Advertising expenditures in dollars	Number of ads, length of ads, estimated cost of ads	Number of ads, length of ads, cost of ads
Markets	NA	National, 210 Nielsen markets, plus Manchester, New Hampshire during presidential election cycles	All
Media	All expenditures	Network TV, local broadcast TV, network cable, local radio	Local broadcast TV, local radio*, local cable**, DBS***, SDARS****
Reporting mechanism	Self-report by groups	Electronic monitoring of signals	PDFs of contracts, uploaded by broadcasters
Unit of analysis	Invoice	Individual spots	Advertising contracts
Research access cost	Free	Negotiated with Kantar, or available from Wesleyan Media Project for nominal fee following 2- to 4-year embargo	Free
Blind spots	Quantity of advertising in units other than dollars, markets purchased, ad creative	Local cable, outdoor, print, small markets not monitored on fulltime basis	National, online, print, outdoor, ad creative

*Notes:* \*Political advertising reports for radio stations with five or more employees in the top 50 markets only began in 2016, and all other radio stations begins in 2018.

\*\*Local cable systems with 5000 or more subscribers, began in 2016, and cable systems with 1000–4999 subscribers begin in 2018.

\*\*\*Direct broadcast satellite services (e.g., DirecTV, Dish).

\*\*\*\*Satellite digital audio radio service (e.g., SiriusXM).

## Political Advertising Spending Measures

*Data Source: Federal Election Commission*

The Federal Election Campaign Act (1971) requires political candidates and committees that register with the FEC to keep records of contributions and expenditures that influence the nomination or election of candidates for federal office. Additionally, as still provided under FEC rules, the law mandated that the source of funding shall be disclosed for all advertising from campaign committees, political action committees (PACs), individuals, or other organizations that “expressly advocates for the election or defeat of a clearly identified candidate.”<sup>3</sup> The primary purpose of requiring disclosure in political advertising was to reduce deception and other forms of corruption in the electoral process without inhibiting political speech or campaigning.

Such disclosure requirements survived a constitutional challenge in *Buckley v. Valeo* as the Court reasoned that disclosure requirements are the least restrictive means affecting political speech by providing information to voters about which interest groups that elected officials are most likely to be receptive toward while in office.

The level of detail within the FEC reports tends toward the vague. Candidates and committees can choose to fill in a “purpose of disbursement” field with any level of specificity. The FEC accepts “brief but specific” descriptions of disbursements such as “advertising—radio, TV, newspaper, or print” as meeting its disclosure requirements.<sup>4</sup> There are no requirements to disclose the number of ads or when the ads were run. Additionally, if the disbursement was made to a representative firm that sells advertising time on multiple media entities, then the station or channel receiving the advertising funds are not necessarily identified. In spite of the low degree of specificity, the FEC files have been used for political science research.<sup>5</sup> However, the lack of detail in FEC filings seems to preclude its use in all but the most large-grained analyses. Arguably, the FEC filings are better employed for reviews of strategic political decisions, and of limited use for explorations of campaign tactics.

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3. See Federal Election Campaign Act.

4. See Federal Election Commission.

5. For instance, Stratmann used FEC filings, as well as industry-data on advertising rates, to establish the efficacy of advertising purchases in congressional races. Hernnson also used FEC data to estimate overall media spending in congressional elections.

*Data Source: Kantar Media Campaign Media Analysis Group*

The dominant<sup>6</sup> supplier of political advertising data in the United States is the Washington-based Campaign Media Analysis Group of Kantar Media (hereafter referred to as “Kantar”).<sup>7</sup> Owned by the world’s largest advertising-agency-holding company, London-based WPP, Kantar is an operation within WPP’s Data Management Investment Group. WPP does not break out revenues for individual operations, but the 2016 WPP Annual Report tallied £2.61 billion (approximately \$3.41 billion USD) in revenue for the Data Management Investment Group, a significant portion of WPP’s overall revenue of £14.34 billion (approximately \$18.76 billion USD).<sup>8</sup> Clients for the Kantar Campaign Media Analysis Group include advertising agencies, political parties, political action committees, and advocacy groups.<sup>9</sup>

Kantar tracks political advertising in the United States on network television, local television, network cable television, and radio. Their coverage area includes the 210 Nielsen markets, plus Manchester, New Hampshire, during the presidential primary season.

Kantar does not publish a description of its advertising monitoring mechanism. However, discussions with Kantar personnel and a review of the data provided indicate that Kantar electronically monitors web feeds of television broadcast stations with software separating program content from advertising. The advertising content is broken into discrete spots, with a digital example of each different spot linked to a database. Kantar reports 26 variables for each spot, including the station name, program title, date and time of air, and spot length. Some of the more subjective elements of each spot are derived through human coding. Coders at Kantar review the spot, assign the name of the advertiser (e.g., “American Future Project”), a campaign (e.g., “President”), an issue (“Faith/Religion”), and a tone (“Positive”). Each spot is assigned an estimated cost. From discussions with Kantar personnel, the estimated cost is derived from discussions

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6. Other suppliers of political advertising data include Nielsen’s Ad Intel (<http://en-us.nielsen.com/sitelets/cls/adviews.html#Resources>) and iHeart Media’s Media Monitors (<http://www.mediamonitors.com>). Additionally, Echelon Insights (<https://echeloninsights.com>) and Advertising Analytics (<https://advertisinganalyticsllc.com>) extract data from the Federal Communication Commission (FCC) online public inspection files for sale to commercial and political clients.

7. Kantar’s main office is in New York, whereas the CMAG is headquartered in Washington, DC.

8. See WPP.

9. See WPP Operating Units.

with advertising buyers and sellers, and reference to political advertising contracts in the FCC Public Inspection File system.

Researchers can access Kantar data through multiple mechanisms. Data can be purchased on a near real-time basis directly from Kantar. The company does not publish a rate card, but per-market costs are in the multiple thousand-dollar range. Aggregate data is offered in summary reports from advocacy organizations that have agreements with Kantar, such as Public Integrity during and after election cycles, but Kantar prohibits purchasers from sharing raw data.

For researchers wishing to analyze raw data, but without financial resources, the Wesleyan Media Project<sup>10</sup> offers downloads of Kantar political advertising data for a nominal fee. The Wesleyan Media Project began tracking campaign advertising following the 2010 election cycle using Kantar data, and offers databases for Presidential, Senate, House, and some state-level races. The Wesleyan Media Project is the successor to the Wisconsin Advertising Project, which tracked advertising in 75 markets (eventually rising to 210 markets) beginning with the 1998 election. The Wisconsin Advertising Project concluded with the 2008 election.

Kantar data through the Wesleyan Media Project is embargoed until the end of the following election cycle. For example, the 2016 presidential election data is unavailable until the conclusion of the 2020 election. Data for US Senate and House elections, as well as governorships and “down ballot” races, are released two years following the election. For example, data for 2016 House and Senate races will be available following the 2018 elections.<sup>11</sup>

### *Use of Kantar Data via Wisconsin and Wesleyan Projects*

There is an extensive history of researchers using Kantar data. Besides a book-length review of election advertising practices,<sup>12</sup> Kantar data was used in studies of how political advertising is targeted,<sup>13</sup> deception in campaign advertising,<sup>14</sup> the prevalence of messages in the environment,<sup>15</sup> and message

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10. See Fowler, Franz, and Ridout.

11. Wesleyan Media Project.

12. See Fowler, Franz, and Ridout.

13. See Ridout et al.

14. See Winneg et al.

15. See Neiheisel and Niebler.

content.<sup>16</sup> The video content that Kantar archives with the data was used to track the proportion of male versus female narrations in campaign ads.<sup>17</sup> Recently, Kantar was one of the data streams in a “Big Data” approach to political incivility in social media.<sup>18</sup>

*The FCC’s Station Public Inspection File system*

Because the broadcast medium has historically been the key mechanism by which candidates and political groups get their messages to voters, the FCC has oversight over an important aspect of political ad spending that falls under the Communications Act (1934). The FCC collects information on political advertising purchases made on licensed broadcast television stations in the United States in accordance with the Communications Act, which requires that broadcast stations provide reasonable access and equal opportunities for candidates running for federal office to purchase advertisements. However, the “equal opportunities” rule provided in Section 315 of the Communications Act does not provide an equal amount of advertising time for all candidates running for the same office. What the law does require is that stations make available the same opportunities (length of ad, day part, cost, etc.) to all legally qualified candidates running for the office. For example, if a television station sells a block of 60-second ads in primetime to one candidate, it has to be willing to sell the same number of ads, at the same length, for the same cost to other candidates in that race.

Specifically, FCC rules 73.3526(e)(6) and 73.3527(e)(5) require that television and radio stations keep a file of “all requests for specific schedules of advertising time by candidates” and issue advertisers, as well as information about when the ads actually aired “as soon as possible, which the Commission has determined is immediately absent extraordinary circumstances.”<sup>19</sup> The information is provided by the stations and consists of requests for airtime by candidate committees, National Association of Broadcasters affidavits self-certifying the organization as representing a political entity, and the advertising contracts as generated by the station or the station’s sales representation firms.

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16. See Fowler, Ridout, and Franz.

17. Strach et al.

18. See Hopp and Vargo.

19. FCC, About Public Inspection Files.

The requests, affidavits, and contracts are uploaded to the FCC Public Inspection File system in Adobe PDF format. Although the PDF format allows viewers to inspect the documents using any computer, the opportunity for automated data interpretation is limited. Additionally, the structure and file name of each document is up to the purchaser, the station, or the sales representative firm, further limiting the opportunity for automated data interpretation. As noted in its frequently asked questions, the FCC specifically declines to offer naming conventions for broadcasters' Public Inspection Files, stating: "there is no requirement that individual files be named in any particular way."<sup>20</sup> The absence of standardization makes interpretation of files more subjective and error-prone.

In a critique of the FCC's system for tracking political ad buys, the Center for Responsive Politics concluded that the agency's efforts were "useless" for the public to understand who was advertising.<sup>21</sup> The primary shortcoming of the FCC's public file system is that stations do not necessarily know how to code ads from interest groups, which leads to inconsistency and inaccuracy in the data. The FCC file structure provides a folder for "Non-candidate Issue Ads," and it's up to each station to determine what constitutes an issue ad. A further problem is that the FCC's file system is only searchable by station call letters, rather than a particular candidate or the entity purchasing ads. Together, these two problems make it a painstaking task to discover ad spending by 501(c) 4 groups, also known as "dark money." Because these groups do not register with the FEC, the only public mechanism to find dark money is through the FCC Public Inspection Files on a station-by-station basis.

### *Research Using the FCC File System*

For decades, the FCC has required broadcast stations to maintain physical files that include documents such as applications, licenses, letters, Equal Opportunity reports, and key for this study, documents relating to political advertising. Until the FCC's mandated transition to the online system, the files were available to the public and researchers only in visits to the offices of the broadcast stations.<sup>22</sup>

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20. Ibid.

21. See Kim.

22. For instance, a few researchers have used the on-site files. Tyrie and Clift traveled to 31 cities to evaluate the availability and usage of the file system. Prior visited television stations in Columbus, Ohio to count the runs of political ads as a mechanism for improving the validity of content analyses. A larger study by West et al., compared national advertising purchases with local ad buys in four markets with data obtained through station visits.

The transition to the online Public Inspection Files<sup>23</sup> had the potential to increase the volume of research, as investigators could access the files without the time and expense of trips to stations. However, we were able to find only two studies that used the political files within the online FCC system as a data source.<sup>24</sup>

## Research Questions

In sum, our review of the research based on the three data sources (FEC, Kantar, FCC) indicates an ongoing interest in tracking the sources and quantities of political advertising. FEC data is freely accessible, but reported in such a way as to limit its usefulness for measuring political advertising tactics. Kantar Media and the FCC Public Inspection Files are what remains. However, the reliance on purchased Kantar data, and the scant employment by researchers of freely available FCC data, indicates a perceived or actual lack of viability for the FCC Public Inspection File system as a source for research data.

Accordingly, this study explored the suitability of the FCC files for tracking political advertising. We first report the usefulness of the FCC Public Information Files as a research tool, evaluating the accessibility and cost of “free data” in terms of researcher time. We then explore the extent to which political ad data from the FCC and Kantar Media deliver consistent results, focusing on the source and amount of advertising purchased. If data can be extracted efficiently from the FCC system, and the data paint a valid picture of political advertising expenditures, researchers will have methodological and budgetary choices.

(RQ1): To what extent is the FCC Public Inspection File system a viable supplier of political advertising source and quantity data?

(RQ2): To what extent is the FCC Public Inspection File system file a valid indicator of political advertising source and spending?

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23. See Federal Communications Commission, “Public Inspection File Demo.”

24. In her doctoral thesis, Moshary took an econometrics approach to argue that a price differential existed for airtime purchased by supporters of different political parties that could not be distinguished by any quality other than the party preference of the purchaser. To conduct the analysis, she reviewed advertising contracts from stations in 19 markets. The second study was an analysis by the Campaign Legal Center of 1220 political advertiser identification forms filed with 240 stations in four markets, finding errors or omissions in 35% of the filings. See McGehee and Moran.

## Method: A Data Comparison Approach

This current research involves a comparison of broadcast commercial advertising source and quantity as uploaded to the FCC Public Inspection File system with Kantar Media's capture of presidential advertising for the same campaign and market. FEC data were not analyzed, as invoices could not be efficiently ascribed to a single market. We chose a single market and single time period: Des Moines, Iowa, during the nine months of advertising for 2016 Presidential Caucus. This market seemed appropriate for a test of source and quantity of political advertising, as the Iowa Caucuses host one of the largest numbers of candidates vying for inclusion in the later stages of the campaign, and those candidates, plus super PACs and other organizations, purchase enough advertising to saturate the broadcast schedule with political advertising, pushing out all but a limited amount of local advertising.<sup>25</sup> The multi-month campaign, the extensive number of candidates, political action committees and interest groups, as well as the number of ads run created an environment suitable for a test of the FCC's Public Inspection file system.

The coding of FCC Public Inspection Files was conducted in cooperation with the Investigative Reports unit of one of the state's newspapers, which used the data for a series of articles on political advertising spending in Iowa's eight Nielsen markets. Television call signs for each of the markets were determined using the Television Bureau of Advertising (TVB) markets and stations list. Advertising contracts from full-power broadcasting stations were entered. Excluded were public television stations, low power stations, station translators, and stations not selling advertising.

Contracts were entered for both candidate committees and noncandidate organizations. As many contracts were updated as the campaigns progressed, only the final version of each contract was analyzed.

A trained student coder inspected each contract, recording the contract number as applied by the advertising time seller, the advertiser, start/stop dates, gross cost, and number of spots. Coding for advertising running between June 1, 2015 and February 1, 2016, the date of the Iowa Presidential Caucuses, began in October 2015 and ran through the first week of February 2016.

The coders were assisted by a semiautomated Google Sheets spreadsheet.<sup>26</sup> Programming within the spreadsheet extracted the station name

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25. See Pfannenstiel and Kummer.

26. A sample Google Sheets with data is posted at <https://bit.ly/2CbW5MW>.

from the URL of the contract in the FCC system, and automatically referenced the station market from an FCC station reference list. Pull-down menus within the spreadsheet referenced the most recent list of political advertisers (sources) as published by the political advocacy group OpenSecrets.org, thus standardizing the source name and spelling.

### FCC Public Inspection Files: Somewhat Usable, Highly Correlated to Commercial Data

This research compared data extracted from the FCC station files with data purchased from Kantar for the purchasers of the ads, the number of ads purchased, the television stations running the ads, and the cost of the ads.

Through the end of the Iowa Caucuses, there was approximately \$46 million in political advertising spending related to the presidential campaigns in the eight media markets in Iowa. For the Des Moines market alone, Kantar reported “seeing” 28,738 ads with an estimated value of approximately \$17.8 million. Kantar listed 39 different advertisers (in our analysis, termed “Sources”) in the Des Moines market, with Hillary Clinton, Right to Rise USA, and Bernie Sanders top spenders. The analysis of FCC data used OpenSecret.org’s presidential political advertiser list,<sup>27</sup> of which 32 were active in the Des Moines market. Within the FCC data, there were 29,213 ads contracted. Hillary Clinton, Right to Rise USA, and Bernie Sanders were also the top spenders.

### Timeliness of FCC Data

The FCC does not set a deadline for stations to upload political advertising contracts, instead asking stations to upload contracts “as soon as possible,” which an FCC document has interpreted as “immediately.”<sup>28</sup> For this research, the lag time between contract availability and upload to the FCC was calculated as the difference, in days, between the start of the ads called for in the contract and the date of the upload to the FCC system. Among the 1175 contracts analyzed, upload dates ranged from 154 days in advance of first air to 147 days after the first spot in the contract aired. Overall, the

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27. See Center for Responsive Politics.

28. See *supra* note 15.

TABLE 2 FCC-Derived Presidential Advertising on Des Moines Broadcast Stations

Station	Contracts	Ads	Spending (\$)	Report Lag*	SD
KCCI	412	7872	9,155,629	6.46	40.67
KCWI	104	1713	133,064	-5.53	59.10
KDSM	174	3847	1,144,518	35.47	36.86
WHO	313	9691	7,790,609	3.98	42.89
WOI	172	6090	1,527,724	14.23	42.24
Total	1175	29,213	19,751,544	10.17	44.37

*Notes:* Data covers June 2015 to February 2016.

\*Report lag is mean number of days between first airing of spots in a contract and upload of data to the FCC file system. Negative numbers indicate mean number of days in advance of first air.

mean time to file was 10.2 days (standard deviation [SD] = 44.37). The two stations with the most contracts in the market each averaged less than a week, whereas stations with fewer contracts typically, but not always, were later in their uploads, with as much as a five-week lag (see Table 2).

The average ten-day lag between air and contract upload may have little impact upon academic researchers. Additionally, our analysis may have overstated the lag time, as we measured the time between air and the final revision of the contract. Contracts can be revised and uploaded multiple. Lag times might have been shorter had we analyzed the first upload, rather than the last. In sum, the FCC Public Inspection File system appears to provide timely data for all but the most time-sensitive research projects.

### The Cost of Free FCC-Derived Data

The PDF files in the FCC system provide images of station documents. Extracting data from the image was a challenge. First, the coder had to find the most recent contract in a folder that contained multiple documents, including a National Association of Broadcasters (NAB) questionnaire establishing the source and scope of the campaign, requests for airtime, invoices, and several revisions of the contract. There was no format standardization from contract to contract between and within stations. The PDF format and absence of standardization precluded using technology to capture the information locked within the contract, and required human review of each contract at each revision. Time constraints also limited the amount of information that could be captured from each contract. For instance, contracts typically included the names, dates, and times of the

programs in which ads were scheduled to air, as well as the length of the ads. As the research program was interested in the source and quantity of political ads, and uninterested in scheduling issues, program information was not captured, and would likely have substantially increased the amount of time needed for entry of each contract.

Coders were students drawn from a 32-person advertising media class. The course focused on political media, and data input and analysis were integrated into the syllabus. The class members were assisted by five politically interested students and two reporters from the collaborating newspaper's investigative reports team. For the entire project, students coded 3786 contracts for the eight markets. In a postcourse survey ( $N = 21$ , 58 percent response rate), students reported coding, on average, 62.6 files each ( $SD = 28.97$ ). Each coder invested an average of 3 minutes per file on coding ( $SD = 2.63$ ), with a range of 1–10 minutes per file.

Our initial research question focused on the viability of the FCC Public Inspection File system as a supplier of data for academic studies. Our experience, based on one long-running, multi-advertiser, multi-market, media-saturated campaign, was positive. Based on the three-minute data-entry average, the entire team of coders spent approximately 60 person-hours entering the FCC data. Although the coders were unpaid, had they been paid professional data-entry rates, the total cost would have been only a fraction of the purchase price of Kantar data.

Thus, in response to the first research question, data from FCC Public Inspection File system can be a viable choice for scholars for studies of broadcast television advertising in which the number of markets, the number of campaigns, and/or the amount of captured detail, are limited to a subset of races and markets in the United States.

### The Validity of FCC-Derived Data

The second research question addressed the extent to which the FCC data is a valid representation of the source and amount of political advertising spending. The face validity of the measures, such as the source name on contracts, the call letters of the broadcaster, the number of ads purchased, and the cost of the ads, is high. The FCC-derived data and Kantar materials for the sources of advertising, number of ads, and the cost of the advertising were compared to assess the convergent validity of the FCC-derived data. There is confidence among researchers, as evidenced by their

continued use of Kantar data, that Kantar accurately represents political advertising activity. Accordingly, this research employed Kantar data as the comparison set to assess the validity of the FCC-derived data.<sup>29</sup>

The analytic process consisted of combining Kantar Media's presidential advertising report for the Des Moines market (28,738 records), delivered as an Excel file, with an Excel file containing the 1174 contracts derived from the FCC Public Inspection Files. Source (advertiser) names were reconciled for multiple candidates and organizations. Both Kantar and stations occasionally used unstandardized short titles for source names. For example, while Hillary Clinton's committee was officially titled "Hillary for America," Kantar Media listed "Clinton, Hillary," whereas television station contracts showed a mix of titles such as "Clinton for President" and simply "Clinton." For this analysis, source names were standardized to match candidate committees and organizations listed as advertisers by Opensecrets.org. In addition, several candidates and organizations failed to appear in both the 39-source Kantar Media database and the 32-source FCC-derived data. For example, Kantar Media tracked spots from "Californians for Population Control," while advertising from that organization was not captured from the FCC-derived data. Combined, there were 43 unduplicated sources. All were retained for this analysis (see Table 3).

TABLE 3 Comparison of FCC-Derived and Kantar-Reported Presidential Advertising by Source

Source	FCC spots	FCC dollars (\$)	Kantar spots	Kantar dollars (\$)
America Next	191	150,510	185	326,690
America's Liberty PAC	80	141,200	91	75,070
American Encore	0	0	64	87,940
American Future Project	127	114,729	188	66,560
Americans United for Chang	0	0	17	29,830
Believe Again	1044	976,745	930	1,284,490
Bernie 2016	5415	2,417,107	5406	2,071,320

(Continued)

29. For a discussion of convergent validation, see Adcock and Collier.

TABLE 3 Comparison of FCC-Derived and Kantar-Reported Presidential Advertising by Source (*Continued*)

Source	FCC spots	FCC dollars (\$)	Kantar spots	Kantar dollars (\$)
Californians for Population Stabilization	0	0	134	32,740
Carly for President	208	145,025	199	51,210
Carson America	1,865	831,782	1,813	831,080
Chris Christie for President	24	9,729	17	7,970
Club for Growth Action	177	293,100	185	443,260
Conservative Solutions PAC	854	1,416,125	801	945,250
Conservative Solutions Project	393	613,870	357	605,940
Cruz for President	1,053	599,443	985	473,170
Donald J. Trump for President	1,193	545,775	1,257	531,730
ESAFund	17	54,550	140	80,960
Foundation for a Secure and Prosperous America	0	0	104	35,720
Future45	4	9,695	4	7,350
Generation Forward	42	69,550	41	49,790
Gilmore for America	0	0	25	15,510
Hillary for America	7,653	3,566,414	7,737	3,576,090
Huckabee for President	0	0	25	15,510
Jeb 2016	122	34,305	0	0
Kasich for America	0		25	15,510
Keep the Promise PAC	118	389,775	132	244,370

*(Continued)*

TABLE 3 Comparison of FCC-Derived and Kantar-Reported Presidential Advertising by Source (*Continued*)

Source	FCC spots	FCC dollars (\$)	Kantar spots	Kantar dollars (\$)
Lawrence Lessig for President	104	40,658	104	23,600
Lindsay Graham 2016	0	0	25	15,510
Marco Rubio for President	3,358	1,675,770	1,802	973,010
National Draft Ben Carson for President Committee	18	20,750	0	0
Opportunity and Freedom PAC	1,855	358,535	1,797	523,420
Our Principles PAC	91	136,710	154	79,350
Pataki for President	0	0	1	6,580
Purple PAC	114	150,345	296	244,100
Pursuing America's Greatness PAC	184	456,585	362	267,620
Rand Paul for President	0	0	26	12,140
Right to Rise USA	2,080	3,269,737	2,445	2,765,560
Security is Strength PAC	96	84,130	84	111,540
Seldon Henry	4	19,000	0	0
Stand for Principle PAC	31	87,750	516	394,570
Stand for Truth	438	763,200	0	0
Unintimidated PAC	259	307,445	264	486,800
Willie Wilson 2016	1	1500	0	0
Grand Total	29,213	19,751,544	28,738	17,808,860

*Note:* Data covers broadcast television in the Des Moines media market, June 2015 to February 2016.

The number of ads and the cost of the ads as measured by Kantar and reported to the FCC were submitted twice, by source and station, to paired sample t-tests (Davis 1997). Typically, t-tests are used to determine if two samples have different means. In this analysis, the absence of mean differences between the Kantar data and the FCC data was considered an indicator of convergent validity.

### FCC and Kantar Data Statistically Indistinguishable

For the number of ads run by each of the 43 sources, paired samples t-tests found no significant differences at the 0.05 level (two-tailed) between the FCC and Kantar data for the number of ads purchased by each source ( $t = 0.663$ , ns) and the amount spent by each source ( $t = 1.357$ , ns). In terms of which of the five Des Moines stations ran the ads, paired sample t-tests showed no difference between FCC and Kantar for the number of ads run on each station ( $t = 0.264$ , ns) and the revenue generated by those ads ( $t = 0.454$ , ns). In sum, the lack of differences between the two sources, with Kantar data collected electronically on a per-spot basis and the FCC data collected manually on a per-contract basis, indicated a convergent validity for both data collection mechanisms (see Table 4).

### Indistinguishable, But Not Identical

Although the Kantar and FCC-derived data are highly correlated, the differences in line-by-line results (See Table 3) illuminate the

TABLE 4 Correlations by Sources ( $N = 43$ ) and Stations ( $N = 5$ )

	FCC spots	FCC dollars	Kantar spots	Kantar dollars
FCC Spots		0.875** $N = 43$	0.983** $N = 43$	0.884** $N = 43$
FCC dollars	0.870 $N = 5$		0.872** $N = 43$	0.976** $N = 43$
Kantar spots	0.997** $N = 5$	0.848 $N = 5$		0.908** $N = 43$
Kantar dollars	0.885* $N = 5$	0.967** $N = 5$	0.868 $N = 5$	

Notes: Upper right correlations for sources, bottom left correlations for television stations.

\*Indicates correlations significant at the 0.01 level (two-tailed).

\*\*Indicates correlations significant at the 0.01 level (two-tailed).

methodological challenges of measuring political advertising sources and quantities. The FCC-derived data recorded contracts for 29,213 spots, whereas the Kantar system captured just under 28,738 spots. For 33 of the 43 advertisers assessed during the caucus period, the difference between the FCC and Kantar data was less than 100 spots per advertiser. The fewer spots seen by Kantar versus contracted in the FCC data could be due to unreported spot cancellations.

Overall, there were 17 cases in which the FCC data reflected more spots than seen by Kantar. Those could have been due to identification errors or cancellations not reported to the FCC. There were 23 cases in which Kantar reported more spots than contracted by the FCC. Those could be explained by identification errors, stations running more spots than contracted or making good for partial or interrupted runs of spots, or stations not reporting advertising buys. However, the difference between the total number of spots reported as purchased to the FCC and seen by Kantar amounted to 2 percent.

On occasion, there were larger discrepancies, most notably the 1556 spot difference for Marco Rubio's presidential committee. The FCC-derived data listed 3358 ads as contracted, with only 1802 seen by Kantar's monitoring. The difference cannot be explained by miscoding super PAC spots, as the FCC and Kantar data were in close agreement for the Rubio-supporting super PACs, with a 53 spot underreporting to the FCC for the Conservation Solutions PAC and a 36 spot underreport to the FCC for the Conservative Solutions Project.

Turning to the dollar value of the spots, the FCC-derived data indicated almost 10 percent more spending than Kantar. The difference can be attributed in part to the data collection mechanisms. As television stations do not typically post rate cards and spot costs are dynamic,<sup>30</sup> Kantar estimates the dollar value of each spot captured by their recording system, using an undisclosed estimation mechanism. The FCC-derived data, based on amounts agreed to by the advertising sellers and purchasers, would be expected to be closer to actual spending than Kantar.

The most substantial divergence between the Kantar and FCC data is in the naming of advertisers (sources) in the presidential campaign. Although there was no question between Kantar and FCC for presidential committees, the numerous super PACs and interest groups represented a definitional challenge. Kantar identifies political spots, and assigns advertiser

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30. See *supra* note 20.

names, through visual inspection of the advertising creative, whereas the FCC system is dependent on sources properly identifying their goals on paperwork filed with each station. The system is prone to identification errors, and identification of sources is at the heart of public monitoring of campaign financing.<sup>31</sup> For example, Californians for Population Growth was not captured by the FCC data, although Kantar recorded 134 ads. In general, both campaign committees and PACs purchasing small numbers of ads were more likely to be missed in the FCC data than by Kantar, with Rand Paul, George Pataki, and John Kasich among those with no reports to the FCC but a few airings captured by Kantar.

### The FCC as a Data Supplier: Discussion and Limitations

This research explored the viability of the FCC Public Inspection File system as a data source for political science research. Accordingly, in our discussion we first review the usability of the system and the validity of its data. We then discuss the limitations of the FCC as a monitor of political advertising activity, and then outline the limitations of our analytic approach.

Based on the files from television broadcasters captured in this study, the FCC system provides a usable data source on political advertising activity on broadcast television. Reports in the form of PDFs of advertising purchase contracts uploaded from television stations can be interpreted by system users to show the source and amount of advertising.

The stations in this study did a commendable job of reporting political advertising purchases. Contracts were uploaded, on average, only a few days after the start of the advertising buy, and many were uploaded prior to the start of advertising. Our comparison between the FCC self-reported data and Kantar's machine-based monitoring indicates that the FCC system captured nearly all of the political advertising, with a portion of the difference explainable by difficulties in assigning and categorizing source names. The greater number of ads in FCC-derived data versus Kantar's monitoring indicates that stations are compliant in reporting purchases. Were stations failing to report political advertising purchases, we would expect to have seen lower numbers for ads from FCC-derived data versus Kantar's electronic monitoring.

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31. See McGhee.

However, usability was constrained by the FCC's reliance on the PDF file format and the absence of consistency in contract formats. Each contract had to be reviewed by a human coder, increasing the time-cost and opportunity for coding error. However, even at commercial data-entry rates, the cost of hand-entering FCC data amounted to a fraction of the purchase price of Kantar data. Although Kantar data provides information, such as links to the advertising creative, that is unavailable in the FCC system, we concluded that the FCC system is a viable source for political advertising data.

### *Limitations of the FCC's Public Inspection Files*

Although the difficulties in searching and interpreting PDF documents in the FCC file system have been discussed in this article and elsewhere,<sup>32</sup> there are a number of other shortcomings in the FCC's approach that undermine the principle of public transparency in who is financing political advertising during election campaigns.

The FCC's system is blind to political advertising purchased on a national level and then transmitted by local broadcasters. Because stations, not networks, report political purchases, there are no records in the FCC Public Inspection Files for network buys. In the past, most political advertising was purchased on a market-by-market basis, but in the recent presidential campaign substantial sums were spent on national advertising purchases. Kantar Media reported that candidates Trump and Clinton purchased over \$86 million of national advertising through the end of October 2016, with an additional \$33 million reported as "other," presumably super PACs, presumably with ads running on broadcast networks as well as cable television networks.<sup>33</sup> Because of the FCC's failure to track national broadcast advertising, an organization or individual can use the public airwaves to influence elections, but avoid public disclosure by purchasing advertising at the national level, rather than through local broadcast facilities. The absence of national-level disclosure fails to provide critical information to voters.

"Stealth advertising"<sup>34</sup> in the form of advocacy outside of traditional commercials is a blind spot in both Kantar's and the FCC's systems. For

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32. See Kim; and McGehee and Moran.

33. See Dumenco.

34. As described by Cain.

example, in 2004 Sinclair Broadcasting scheduled the anti-John Kerry biopic “Stolen Honor” to air on its television stations across the United States two weeks before the election.<sup>35</sup> Although the FCC refused to take action,<sup>36</sup> the negative publicity generated by Sinclair’s plan resulted in the station airing only parts of the biopic along with some pro-Kerry material to satisfy the equal opportunities provision of Section 315 of the Communications Act. Nonetheless, this example illustrates the importance of accurate disclosure and easy access to the FCC’s file system so that researchers and the public can effectively track political ad spending.

A third limitation of the FCC data is the absence of digital advertising data. The FCC has limited jurisdiction over digital advertising, which is heavily used by political campaigns.<sup>37</sup> The media planning firm ZenithOptimedia claims that 2016 was the last in which television advertising spending on behalf of all advertisers exceeded digital advertising spending. Spending on digital products such as video, display, mobile, and search by all US advertisers overall outpaced television spending in 2017, and the trend is expected to continue.<sup>38</sup> The FCC is jurisdictionally blind to the digital flow of advertising that goes to websites, mobile telecommunications devices, as well as billboards and other forms of paid messages that go from sources to the electorate, because it is beyond the agency’s scope of authority. For now, it is up to individual media organizations to disclose the sources of political advertising, such as the Facebook/Instagram plan announced in 2018 to provide an application program interface (API) for researchers and public interest groups to monitor ads tagged as “political.”<sup>39</sup>

### Practical Implications for Researchers: FCC versus Kantar Data via the Wesleyan Media Project

Kantar-based data available through the Wesleyan Media Project provides multiple advantages for researchers over the FCC-derived for FEC-based data. The Kantar data is at the level of the individual spot, and unlike FCC or FEC data, each data line links to an online collection of advertising creative. In addition, Wesleyan Media Project summarizes the rhetorical

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35. See Rutenberg.

36. See NBC News.

37. For a review of digital advertising in recent elections, see Franklin, Ridout, and Franz.

38. See Ad Age Datacenter.

39. <https://newsroom.fb.com/news/2018/05/q-and-a-on-ads-transparency/>.

approach of the spot: positive, negative, or comparative.<sup>40</sup> The cost of accessing Kantar data via the Wesleyan Media Project is minimal at \$20 per data set.<sup>41</sup>

However, there are two salient limitations to Kantar data via the Wesleyan Media Project: timeliness and transparency. The Wesleyan Media Project releases data from Kantar after the conclusion of the following election cycle. Thus, advertising data from US Senate and House races are available following a two-year lag, the presidency are released after a four-year lag. If timeliness is a factor in a research program, the delayed availability of Kantar data via the Wesleyan Media Project may be a hindrance. The second limitation is the absence of disclosure by Kantar of its data collection methods. Kantar does not publish its methods for collecting data, nor their procedures for coding the source of the advertising.<sup>42</sup> If transparency of data collection methods is of value, then the absence of detail on Kantar-based data may be a limitation.

### *Methodological Limitations*

This project took advantage of the extensive political advertising activity that accompanied the 2016 Iowa Presidential Caucuses. The broadcast television stations in the Des Moines media market are experienced in handling the advertising-saturated political campaigns, and thus may be more compliant to FCC regulations than stations in markets where political advertising is less lucrative. Thus, the scale of advertising activities in the Des Moines media market may limit generalizability to other markets and campaigns.

We did not measure inter-coder reliability for this project, nor does Kantar report inter-coder reliability. Nor was there a mechanism to certify each FCC-derived entry. However, given the consonance between the two data sets, coder error seems to be a minor issue.

Our data collection ended a few days following the Iowa Caucuses. It is probable that ending the data collection at that time resulted in missing cancellation notices that were filed later with the FCC. Additionally, FCC rules are inconsistent in specifying the duty of stations to notify the FCC

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40. See Fowler.

41. See Wesleyan Media Project.

42. Kantar Media is not alone in its reluctance to disclose its methods. None of the advertising monitoring firms listed earlier (Media Monitors, Echelon Insights, Advertising Analytics) publish their data collection methods.

of cancellations, allowing stations to provide only the name of a contact person in lieu of cancellation notifications. It is possible that the absence of cancellation notices was the reason for the largest gap between FCC-derived data and Kantar reporting in this study, advertising for candidate Marco Rubio. Contracts in the FCC-derived database indicated the purchase of over 3300 ads for Marco Rubio, whereas Kantar reported the runs of 1802 ads. In any case, the inclusion of cancellation notices filed after the end of the data collection would have served to increase the correlation between the FCC and Kantar's monitoring data.

Finally, the viability of the FCC system for political advertising data from radio stations, cable systems, and other distribution mechanisms was not explored in this study, and is a question for the future.

## Conclusion

This research set out to explore the usability and validity of the FCC's Public Inspection File system as a source of political advertising data for information policy researchers, public interest groups, and others who are interested in knowing who is purchasing political advertising and how much they are spending. The FCC files are somewhat accessible, and the data derived from the FCC files match well to Kantar's station surveillance system.

The work done by broadcasters to upload contracts is not matched by the FCC system's use by researchers. As evidenced by the stream of research that references Kantar data, researchers want information on the source and quantity of political advertising. But with few exceptions, researchers have not accessed the FCC material. The FCC's failure to track national-level advertising, and its insistence on uploads of non-machine-readable documents, adds unnecessary opacity to the goal of transparency in the political use of national airwaves.

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