

Vox Veritatis: Reply to Hart-Brinson

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VOX VERITATIS: REPLY TO HART-BRINSON¹

We have read with interest Hart-Brinson's critical comment. We are disappointed that his comment is almost exclusively concerned with our analysis of application filing and success rates, and that he only fleetingly mentions our analysis of the cultural impact of low-power FM radio stations. A major thrust of our article was to show that a cultural social movement generates organizational density and diversity, and these products in turn alter the consumption of cultural goods.

Hart-Brinson's comment rests on the premise that we have not accounted for the regulatory power of the state, and thus our findings are flawed. This premise is iterated and reiterated as he argues that our findings are doubtful or spurious with a confidence that is inversely proportional to the evidence available to him. We are not sure why the role of the state should exclude a role for the social movement, as Hart-Brinson seems to assume. We are willing to treat it as an empirical question, however, and therefore subject his concerns to empirical tests. Tables 1–3 (below) provide the results of our additional analyses and show that his concerns are unfounded.

Hart-Brinson offers the following: (i) FCC rules severely limited opportunities to found LPFM radio stations in the largest metropolitan areas, making our findings on the applications rates spurious, (ii) the change in FCC rules between application rounds 2 and 3 makes our findings on applications and success rates spurious, and (iii) our data are contaminated by amended applications. He also raises two objections to our interpretation: (iv) applicant diversity was never a formal criterion of the FCC and could not have had any effects on success rates, and (v) LPFM applicants are not social movement participants, so discourse must be a consequence and not a cause of organization building. We start with his claims about our empirical findings and then turn to Hart-Brinson's claims regarding interpretation.

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FCC Exclusion of Large Metropolitan Areas Undermines Our Results

Hart-Brinson assumes that there is a simple divide between large cities and rural areas that our analyses have overlooked. Had he looked more carefully, he would have found that we already account for population in our analyses. We showed that population has a significant positive effect on applications and a significant negative effect on acceptance of applications by the FCC (pp. 823-25).

Furthermore, if Hart-Brinson's claim is correct, there should be a difference between our original analyses and one that omitted the top 50 metropolitan statistical areas (MSAs). To test for this difference, we ran

TABLE 1 Application Rates in All Counties versus Counties outside the TOP 50 MSAs

		Not Top	
Variable	All	50 χ	
Chain concentration	745	-1.479	.15
	(3.460)	(3.644)	
Organizational infrastructure	.013**	.013**	.00
	(.005)	(.005)	
Discourse (within county)	063**	081*	.20
	(.011)	(.040)	
Chain concentration × within-county			
discourse	1.617**	2.177*	.01
	(.314)	(.909)	
Chain concentration × organizational			
infrastructure	.074	.070	.44
	(.085)	(.085)	

Note. -N = 12,157. Numbers in parentheses are robust SEs. Control variables are not shown. The final column shows test statistics for coefficient differences derived from seemingly unrelated estimation.

additional analyses comparing the analysis of applications in our article with one that retains only counties outside the top 50 MSAs (see table 1). Our results do not support his claim: our findings are preserved in the analysis that omits the largest MSAs, and tests of coefficient magnitude differences are insignificant for the hypothesis-testing variables (the control variables, which are not displayed for brevity, show some significant differences). Most important, movement infrastructure proxied by nonprofit density increases applications (our original hypothesis 3), and applications are boosted in areas with discourse favorable to LPFM and

^{*} P < .05. ** P < .01.

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 ${\bf TABLE~2}$ Application rates in early and late filing windows

Variable	Early	Late	χ^2
Chain concentration	-7.743	2.428	2.29
	(5.319)	(4.257)	
Organizational infrastructure	.0004	.013**	2.00
	(.008)	(.005)	
Discourse (within county)	076**	066**	.17
	(.015)	(.021)	
Chain concentration × within-county			
discourse	1.682**	1.851**	.06
	(.418)	(.601)	
Chain concentration × organizational			
infrastructure	.306*	012	3.67^{+}
	(.133)	(.103)	

Note. -N=12,157. Numbers in parentheses are robust SEs. Control variables are not shown. The final column shows test statistics for coefficient differences derived from seemingly unrelated estimation.

high chain concentration (our original hypothesis 4), showing the robustness of our results.

Changes in FCC Rules Undermine Our Results

For Hart-Brinson's claim that FCC rule changes influenced application rates to be true, we should see a difference between different *rounds* of applications. To test this claim, we compared an analysis of the application rates in the first two application windows with an analysis of the third and fourth windows (table 2); our findings show that his claim is unsupported. Although the findings must be interpreted with caution—because each data set contains fewer applications than our original models—the results contradict Hart-Brinson. Organizational infrastructure (nonprofit density) appears to produce a stronger result in the later rounds, though the difference between earlier and later rounds is not significant, and the hypothesized interaction of chain concentration and organizational infrastructure (our original hypothesis 5), which was not significant in the full analysis, is now significant, supporting our hypothesis in the two first periods.

We conducted an even more stringent test of Hart-Brinson's claim that FCC rule changes were not captured in our analyses. Table 3 compares the analysis of success rates in our article with one that stratifies the Cox model by application round. Stratification means that the level and shape

⁺ P < .10.

^{*} P<.05.

^{**} P<.01.

TABLE 3 Success of Applications without and with Stratification of Cox Models

Variables	Regular	Stratified	
Applicant diversity	8.946**	8.872**	
	(.508)	(.471)	
Applicant diversity squared	-13.753**	-13.663**	
	(.729)	(.718)	
Count of applications ^a	.112**	.101+	
	(.038)	(.060)	
Count of applications squared ^a	006**	007*	
	(.002)	(.003)	
Density of LPFM stations ^a	.398**	.755**	
	(.060)	(.158)	
Density of LPFM stations squared ^a	034**	077**	
	(.004)	(.016)	

Note. - Numbers in parentheses are robust SEs. Significance testing of coefficient differences is not available for Cox models. Although only applicant diversity tests our original hypothesis 6, application and density variables are retained in order to show that these coefficients are also stable in the stratified specification. Other control variables are not shown.

of the acceptance rate is allowed to vary freely between application rounds, which is the strongest possible control for changes in FCC behavior. Our results are preserved when adding this statistical control; once again, the effect of applicant diversity on success endures (our original hypothesis 6).

We believe our analyses decisively rebut Hart-Brinson's critique of our empirics. It is easy to discern the weakness of his critique: he overplays the role of the state in determining individual and organizational behavior. He repeatedly argues that organizational action is decisively limited by government regulation, suggesting that potential LPFM applicants limited their own agency in response to state action, which he argues influenced LPFM license application and acceptance rates more dramatically than organizational and social movement processes did. In so doing, Hart-Brinson overlooks the impact of social movements on organizational action and, in particular, how potential founders are influenced by discourse and existing organizations—a staple finding in organizational ecology (see Hannan, Pólos, and Carroll 2007). We find it curious that he seems to be denying the impact of social movements on organizational action in this case, in contradiction to his own research agenda (Brinson 2006). Next, we consider his two comments on interpretation.

a Nationwide/100

⁺ P < .10.

^{*} P < .05. ** P < .01.

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Elimination of Amended Applications

Hart-Brinson's claim that we failed to report the treatment of amended applications is inaccurate. In fact, we preserved all applications, but to avoid double-counting we did not treat amended applications ("amendments") as new applications (p. 815). This procedure produces data on organizational founding attempts that are uncontaminated by FCC instructions to amend applications.

Applicant Diversity and Its Effects

Hart-Brinson argues repeatedly that our findings on applicant diversity could not be correct because the FCC's formal criteria do not include applicant diversity. But we do not model the formal decision criteria of the FCC. Formal criteria do not need to be modeled through regression analysis; they can be quoted from documents, as Hart-Brinson does in his comment. Formal and informal criteria can differ in any decision-making situation, however, especially in a heavily politicized one. As March and Olsen (1995) noted, rules provide parameters for action instead of dictating specific action, and state actors are capable of adapting policies without changing rules. It is telling of his assumption of agency inertia that he cites *procedural* rules to justify a conclusion that the FCC lacked *outcome* control. Our approach is to infer informal criteria in use from the decision outcomes, which we understand as standard procedure in social science and a good use of regression analysis.

Most important, Hart-Brinson offers no plausible explanation for the significant findings on applicant diversity in our article, only a complicated story on how two different churches would be more willing to collaborate than a church and a school. One could easily construct a believable narrative in the opposite direction. He also neglects to consider that organizational action may be influenced by anything other than state regulation, like organizational diversity.

We believe there Hart-Brinson's comment suffers from two fundamental misunderstandings. First, his depiction of resource partitioning theory is unusual. As we explain, resource partitioning theory holds that greater diversity of underserved voices—potential radio broadcasters, in this case—predicts greater success of organizing efforts, independent of institutional constraints. This theory is consistent with our findings. Second, he misinterprets our findings, arguing that "a straightforward interpretation" would favor model 5 over model 6, which includes a curvilinear term, without paying attention to model fit. The coefficient estimates and fit statistics in these models clearly show that diversity affects application acceptance rates. The more organizational diversity there is in a com-

munity, the more likely the community is to generate successful license applications. Along with FCC action, community cooperation through sharing of resources, education, and support is a likely mechanism for this result. In contrast, as organizational diversity increases beyond a threshold level, so does competition, driving success rates down.

LPFM Applicants Are Not Social Movement Participants

Finally, Hart-Brinson argues that we erroneously treat LPFM applicants as social movement participants "rather than as applicants to a government program." His argument in support of this critique is that free radio activists were barred from applying for licenses; consequently, those applying for licenses could not have been movement participants. According to this logic, only radicals are movement participants, and moderates not at the radical fringe cannot be considered movement participants. This is a narrow interpretation of movement participation, and one that does not hold up to empirical scrutiny. Microradio activists encompass a broad diversity of actors with varying interests, not all of whom were free radio activists (Nickolaus and Judith Leggett and Don Schellhardt, who filed the petition proposing an LPFM service in 1997, among them).

Hart-Brinson's narrow interpretation of social movement activity leads him to make an error in interpreting the causal structure of our theory when claiming that we "mistake discourse in support of LPFM for a predictor of the number of applications when in fact it was a *consequence* of movement activity." Empirically, it is impossible for discourse to be a result of applications, as all comments were filed between January 1998 and January 2000, whereas the first application window opened on May 30, 2000.

More important, Hart-Brinson's logic leads him to conclude that most comments made in the two-year period were filed by free radio activists. In fact, even a quick perusal of the comments, which are publicly available from the FCC, reveals no strong connection between radical activism and the tendency to comment, nor necessarily a strong link between commenting and license application. Even if radicals were vocal, moderates (organization builders) benefited. We think this outcome is consistent with the number of studies on radical flank effects, which show that radicals pave the way for moderates (e.g., Haines 1984).

Hart-Brinson ends his comment by stressing the need to become familiar with a case through interviews and the perusal of documents before analyzing secondary data. He directs this critique at archival studies in general, and ecological research on organizations in particular. We have conducted numerous interviews with LPFM activists (including several of the free radio activists Hart-Brinson himself names), consultants to

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radio stations, and organization builders before analyzing the data, and we looked at reams of FCC documents. Our familiarity with the regulatory and social movement processes are described in our treatment of those very topics (pp. 805–9; see esp. references to interviews on p. 807), though we did not see the need to report the full extent of our contextual work in an article focused on a set of hypotheses derived from theory.

Our last point is that, as we combed through out data to prepare our reply, we discovered that Hart-Brinson had filed a comment to the FCC in 1999, making him an LPFM movement participant. In our view, this participation should have been disclosed in the comment we are responding to here.

In closing, we think that a careful reading of our theory, data, and methods demonstrates the security of the claims made in our original article.

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