

**The Effect of New Media on Political Advertising:
Television Ads and Internet Ads in the 2008 Presidential Primary**

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Abstract

Internet advertising has become an important political campaign tool, accounting for over \$110 million in spending in the 2008 election, but government regulations and industry norms that govern content presented in television advertising do not apply to Internet communication.

This study investigated the differences in political advertising content between ads produced for television versus the Internet. First, a content analysis was conducted using a sample of political advertisements produced by the McCain and Obama campaigns during the 2008 election to measure differences in negativity, accuracy, and accountability. Second, content gatekeepers at television stations and Internet companies were interviewed to verify the findings of the content analysis and to determine whether differences in regulations and norms were responsible for the results.

The content analysis found substantial differences, as Internet ads were less accountable and accurate, but more positive than television ads. In response to these findings, the gatekeepers indicated that differences in accountability were due to the regulatory regimes for both media. Of particular importance is a loophole in Federal Elections Commission (FEC) advertising rules, which states that only paid communications are regulated. Since most Internet ads are uploaded for free to advertiser-supported sites such as YouTube, they are not subject to FEC regulations. In addition, the Federal Communications Commission regulates TV political ads but not Internet ads.

Based on these findings two recommendations were developed. First, FEC rules should be amended to regulate all political advertisements regardless of where the ad is shown. Second, the regulatory oversight of producers of political advertising on the Internet should be strengthened to conform more closely to regulatory regimes in traditional media.

Keywords: Politics, elections, political advertising, Internet, new media, 2008 election

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1. Introduction

Over the past fifteen years, the Internet has emerged as a central communication tool transforming entertainment, news and interpersonal communication. For example, the video sharing site YouTube has become a hugely popular and economically successful entertainment media, illustrated by its viewership of 66 million unique visitors per month (Quinn, 2008). The medium has also proved to be a major business, with Google paying \$1.65 billion for YouTube in 2006 (Google, 2006). In addition, numerous news organizations, including CNN, now offer free video downloads of news broadcasts on their Internet sites, and the *New York Times* is one of many newspapers that offer free online versions of daily issues as well as free access to news archives.

This transformation has progressed to the point that the Internet is becoming a major media for retrieving news and information. According to Nielsen Net Ratings, the Top 5 Internet sites receive over 500 million unique visitors per month. In contrast, the top 5 broadcast TV shows average about 400 million viewers a month (Nielsen, 2008). Furthermore, Jupiter Research reports that the average American now spends approximately 14 hours a week online, the same duration respondents said they spend watching television (Gonsalves, 2006).

Given its enormous growth, it is likely that the Internet is altering the efficacy of numerous public policies governing business development, communications and politics, policies that were not originally designed with Internet technology in mind. The Internet has grown exponentially as a media outlet for political communication, but the laws governing political advertising were designed for campaigns run primarily through television and radio advertising. In addition, industry norms governing traditional media are not yet present in Internet communication.

There have been recent attempts to expand current regulations to cover Internet advertising. The 2008 campaign provides a test case of whether this regulatory expansion has been effective. This study assesses the content in political advertising to measure differences between content presented on the Internet and on TV. It also seeks to determine whether this difference was due to differences in regulation and norms between Internet and television media.

1.1 Internet as a Political Tool

The growth of the Internet as a media for accessing information has led to a corresponding increase in its use as a political tool, as numerous web sites have surpassed the evening news as a key media for political information. There are two principal reasons for the speed of its adoption. First, Internet advertising, particularly through the use of YouTube, is extremely attractive to candidates because the medium is considerably cheaper than television advertising production. Uploading videos to YouTube is free so one only needs to pay the minimal production costs for making the video with no airtime fees that are seen in TV advertising, which can run into the millions of dollars over a long campaign. Second, given the viral nature of the Internet, which allows information to be transferred around the world instantaneously at little or no cost, ads can be picked up and run on additional sites or disseminated through email at no additional cost or labor to a campaign. Taking advantage of these socio-technical features, campaign strategists such as Joseph Trippi, Howard Dean's campaign manager in the 2004 presidential election, and David Axelrod, chief strategist to President Barack Obama in 2008, developed entire Internet advertising and campaign strategies designed to take advantage of these benefits. They have also promoted the creation of

sophisticated Internet plans for all manner of political operations from party building to candidate recruitment (Trippi, 2004; Miller, 2008).

This use of sophisticated Internet strategies led to a major increase in the use of new media communication in the 2008 election cycle and made Internet advertising a significant component of political advertising campaigns set up by the presidential candidates. Lehman Brothers political advertising analyst Douglas Anmuth has stated that campaign spending on Internet political ads was estimated to reach \$110 million in 2008, a three-fold increase over the 2004 election cycle (Kaye, 2008). While this amount represents only about 4% of total advertising spending, estimated at \$3 billion in 2008, it significantly understates the impact of Internet advertising because the return on investment is so much higher than in traditional advertising (Preston, 2008). For example, data collected by Internet research company TubeMogul indicates Barack Obama alone uploaded more than 1650 videos to YouTube during the 2008 election season. These advertisements had a “total watch time”¹ of more than 14.5 million hours. To purchase an equivalent amount of airtime on broadcast TV would have cost almost \$46 million, nearly 6 times the \$8 million Obama spent on all online advertising during the 2008 cycle (Sifry, 2008; Kaye, 2008).

Due in large part to the cost and dissemination advantages of the Internet, all of the major presidential candidates created specific channels² on the YouTube Web site and produced a significantly larger number of Internet ads than television ones. In the four-month span between September 5, 2007 and January 3, 2008, presidential campaigns produced over 1500 Internet-only ads for upload on YouTube. During the same time period, only 97 TV ads were produced in the Des Moines, Iowa media market, the primary television market for the first in the nation

¹ Total number of video hours of Obama’s YouTube ads multiplied by number of views

² YouTube offers frequent users the opportunity to set up their own channels on its site, which are used to categorize content. These are promoted similarly to a television channel. “Visit Barack Obama’s YouTube channel to see his latest video.”

Iowa Caucus, which was held January 3rd (Appleman, 2008). Given the success of Internet political advertising in 2008, campaigns will continue to increase their use of the Internet as a political advertising tool throughout future election cycles.

Due to this change in consumer use of communication media, federal regulations for political advertising in traditional media³ have been updated to address Internet communication. In response to the 2004 U.S. District Court decision in *Shays and Meehan vs. FEC*, which ruled that current Federal Elections Commission (FEC) language did not include Internet political communication, the FEC has issued several rulings and regulation amendments to address the use of the Internet in political advertising (FEC, 2008a). However, these rule changes have left several loopholes, including the exclusion of ads uploaded for free to advertiser supported Web sites, such as You Tube, from federal content regulations. This has led to calls for a new review of current regulations by former FEC chairman Scott Thomas and George Washington University's Institute for Politics, Democracy and the Internet (Stirland, 2007). In addition, Internet media companies are not subject to a federal licensing system, such as the system set up by the Federal Communications Commission (FCC) for television stations. This reduces the regulatory framework surrounding political advertising and makes it more difficult to enforce rules already in place.

1.2 Effect of Government Regulation on Mass Media

The development of federal regulations for political advertising was undertaken to address concerns related to the content in campaign ads. Past research has indicated that this

³ Traditional media are generally referred to as older, more established and less interactive communication outlets, including television, newspapers and radio.

effort has been less than successful as the current regulatory framework allows for a considerable amount of misleading and negative information in current political messages presented in traditional media (Rose, 1984; Ansolabehere et. al., 1994). Given this situation, the opening up of a new advertising outlet through the Internet with less regulation could allow even more negative, inaccurate and unaccountable content to be produced than is already allowed under the current flawed system.

The development of federal regulation of political campaigns began in the early 1900's in response to public concerns regarding the growing sums of money spent on campaigning (O'Shaughnessy, 2004). As mass media became a more integral part of political advertising, with the introduction of radio in the 1920's and television in the 1950's, federal regulations related to general advertising were also applied to political advertising, and broadcast stations were required to conform to rules related to political ads as enforced by the FCC. Following the Watergate scandal which included significant abuses by President Nixon's reelection campaign, public calls for greater federal oversight of political campaigns, including advertising, led to a series of statutes designed to increase the accountability of candidates to the messages they produced and improve public awareness of who was paying for political ads. Since then, additional actions have been taken by Congress to improve the enforcement of federal accountability standards with the hope that these steps would also reduce the negativity and increase the accuracy of campaign messages and advertising (O'Shaughnessy, 2004). These measures were enacted due to growing concern from civic organizations and voting groups over the increasing negativity and lack of accountability and accuracy of political advertising and in response to numerous studies linking negative advertising to the reduced effectiveness of political communication (Jamieson, 1993) and reduced political efficacy (Ansolabehere &

Iyengar, 1995). In particular, the Bipartisan Campaign Act of 2002 was implemented specifically to address issues related to the accountability of candidates to the messages they produced and paid for and included a provision requiring all candidates to take specific credit for the advertisements they produced. It was assumed that requiring candidates to approve the messages they paid for would also reduce the incidence of negative and misleading content in political ads (Lamm, 2004).

Regulations related to political advertising have been codified in four main federal statutes: the Communications Act of 1934, the Federal Election Campaign Act of 1971, the creation of the FEC in 1975, and the Bipartisan Campaign Act of 2002. Two federal agencies have been charged with enforcing regulations regarding political advertising and addressing disputes: the FCC which is tasked with regulating broadcast stations that run political advertisements and the FEC which regulates the campaigns that produce them. The FCC monitors advertising as it relates to political communication over public airwaves. This includes requiring all broadcast stations to announce who paid for or sponsored any advertisement that appears on their station (FCC Statutes, 2008). The commission also monitors incidents of libel and slander, maintains the federal licensing system required for all broadcast stations, and can issue fines or threaten revocation of licenses if rules related to political advertising are broken.

Internet media companies, unlike broadcast stations, are not licensed by the federal government, which means the FCC has no jurisdiction over the Internet (FCC Consumer Affairs, 2008). This eliminates the two-pronged regulatory framework that exists in traditional media. The implications are apparent in practice. One executive at a major Internet media corporation indicated that the company does not review ads to ensure they meet federal guidelines; they rely on the campaign that is submitting the advertisement to review and stay within applicable

regulations (Personal Communication, April 1, 2008). In contrast, a Rochester, New York television station indicated that it has a specific staff dedicated to reviewing political advertisements and will not run ads that do not meet federal regulations, specifically due to concerns over possible FCC sanctions for non compliance, which in extreme circumstances could include revocation of a station's broadcast license. (FCC Statutes, 2008) The station annually receives a 200-page booklet, produced by their parent company, of guidelines they are required to follow related to political advertising (Personal Communication, May 12, 2008).

Unlike the FCC, the FEC mandate is specifically related to political candidates and committees. It has no jurisdiction of television stations or Internet media companies. The FEC is tasked with monitoring political communication for potential violations. Any citizen who believes an advertisement is unfair or illegal can bring a complaint forward to the FEC, and other federal agencies can also refer suspected violators to the attention of the commission (FEC, 2008b). For example, the watchdog group Citizens for Responsibility and Ethics in Washington (CREW) filed six FEC complaints against various campaigns in 2008, including actions against Mel Martinez for Senate and the Republican National Committee (CREW, 2008). The FEC has the power to fine individual campaigns, require them to pull an advertisement from the air, or in extreme cases can file suit to enforce administrative subpoenas (FEC, 2008c). Mel Martinez, U.S. Senator from Florida was fined \$99,000 by the FEC in October of 2008 for a series of violations to commission rules committed during his 2004 reelection campaign (CREW, 2008).

FEC rules related to political advertising increase accountability by directly linking ads to the candidates who produced them. The FEC requires that any group producing an ad for "public communication" include a *Paid-for Icon* denoting who is responsible for the advertisement.

There are also requirements related to the icon's height, font, and the duration of time it needs to

appear on screen. In addition, candidates must verbally and visually take credit for public communications they pay for. This is accomplished through the inclusion of an “I approved this message” statement. Here, a candidate appears on screen during the ad, usually at the beginning or at the end, and states “I am (name of candidate) and I approve this message.” These measures are also designed to reduce negative and misleading content by forcing candidates to take credit for the messages they pay for.

Public communication, as defined by the FEC, includes broadcast, cable or satellite television communications. It also now includes “communications placed for a fee on another person’s Internet site,” (FEC, 2008a, ¶5). As previously stated, this addition was made in 2005 following the U.S. District Court decision in *Shays and Meehan vs. FEC* which ruled that the FEC’s previous definition of public communication did not include Internet communication. The current FEC definition of public communication *does not* include communications placed for free on advertising supported sites such as YouTube. At the time of the initial public comment following the FEC’s Notice of Proposed Rule Making on Internet political communication in the summer of 2005, numerous watchdog groups, including OMB Watch and the Campaign Legal Center, urged the FEC not to include unpaid politicking on the Internet because the groups felt it would reduce civic participation and place numerous new media communication outlets, such as blogs, message boards and chat rooms, under federal regulation (Campaign Legal Center, 2005; OMB Watch, 2005). In addition, these groups argued that regulation of Internet communication should not go beyond federal rules for traditional media which limit content restrictions to paid communication and exempt news and public interest communication (Alliance for Justice, 2005).

During this debate several groups did argue that the proposed rules would open a loophole that could allow campaigns to use soft money and coordinate with unions and political parties in

Internet communication as long as specific fees for advertising were not paid. For example, the Congressional sponsors of the Bipartisan Campaign Reform Act of 2002 (BCRA), Senators John McCain and Russ Feingold and Congressmen Christopher Shays and Marty Meehan, asked the FEC to modify the rule to include certain Internet political communications intended for the general public.

“In our view, the proposed rule’s approach of retaining a broad exemption for Internet communications with the single exception of paid political advertising is an invitation to circumvention. Instead, the Commission should recognize that Internet communications intended to be seen by the general public (which would not include emails directed to a limited and finite number of people) are a form of “general public political advertising.” (McCain, Feingold, Shays and Meehan, 2005, pg. 3).

Still other activists took the opposite approach and called for no regulation of Internet communication and removal of any reference to the Web in FEC rules. Proponents of this approach included then FEC Commissioner Brad Smith and U.S. Congressman Jeb Hensarling (Campaign Legal Center, 2005; Kaye, 2006). Hensarling even sponsored legislation that would have excluded Internet communication from being defined as public communication, a bill that ultimately did not pass. A depiction of the different approaches that were advocated during the rulemaking debate is presented in Table 1.

Definition of Internet Political Communication	Proponents	Reason	Consequence
1. Limited to Paid Advertising	Activist and watchdog groups such as OMB Watch	Wanted to protect free speech and citizen bloggers	Free ads are exempt
2. Broadened to include any communication intended for general public	BCRA sponsors, McCain and Feingold	Wanted to limit loopholes that would allow circumvention of BCRA	Would regulate all communication produced by a campaign
3. Elimination of Internet communication from FEC rules	FEC Commissioner Brad Smith and Congressman Jeb Hensarling	Did not want to limit use of the Internet by campaigns	No regulation of Internet political communication

Table 1: Different Definitions Debated During 2005 FEC Debate

Ultimately the FEC chose option 1, deciding in an opinion released April 12, 2006, to limit the definition of Internet communication to paid advertising. In its decision, the FEC stated that limiting the definition of public communication to the placement of content on another entity's Web site for a fee would include all potential forms of political advertising without inhibiting the Internet political activity or free speech of individual citizens (Federal Register, 2006). In the ruling the commission pointed out that Congress had omitted the Internet from its definition of public political communication so it could only fall under FEC rules if the Internet communication was deemed to be "general public political advertising" (Federal Register, 2006, pg. 6). The rule also cites the American Heritage Dictionary's definition of advertising, which defines it as a paid announcement.

The FEC also noted that given the unique opportunities the Internet provided for individuals to access and produce political content cheaply and easily the commission did not want to create regulations that would reduce the ability of individual citizens to utilize this technology, through blogs, chat rooms, video sharing sites or message boards. It also decided, in

addressing the concerns of people such as McCain and Feingold, that other options for regulating Internet political communication, such as the control of unpaid advertising through the commission's in-kind contribution rules, which regulate communications where services are provided instead of fees, would not be feasible. This was due to the sheer number of communications on the Internet and the difficulty in proving an in-kind relationship in Internet communication where a service may be inferred but not expressly given, such as two political Web sites agreeing to share content which may promote additional viewers to both sites but does not involve a specific service in exchange for content.

Finally, the FEC argued that the inclusion of the phrase "...any other form of communication distributed over the Internet" in its definition of Internet political activity would address future technology developments and prevent the creation of loopholes after the fact (Federal Register, 2006, pg. 17).

Unfortunately, the explosion of YouTube as political tool since the FEC ruling, the site did not launch until November of 2005 only five months before the FEC decision of April, 2006, has changed the business model for Internet political communication and made the definition of advertising as a paid announcement obsolete. Given the lack of FEC control over these unpaid ads there is the potential for the increased production of advertising that does not follow federal guidelines. For example, in the 2008 presidential primary an anti Hillary Clinton attack ad, *Vote Different*, which was produced anonymously and contained no *Paid-for-Icon* or *I Approved Message*, was ultimately proven to be produced by an ally of the Barack Obama campaign. While the situation proved embarrassing for the Obama campaign, the potential political benefit of this type of Internet communication was clear as the ad received over 2.7 million views in a little over three weeks from its initial posting on YouTube and according to Neilson was the

most linked to video in the blogosphere (Stirland, 2007; Scherer, 2007).

The rise of YouTube and the controversy over the *Vote Different* ad have led to FEC hearings (Stirland, 2007) and a bipartisan bill in Congress that would require campaigns to take credit for any online communications they produce (Scherer, 2007), which is similar to the original proposal put forth by McCain and Feingold in 2005. However, no formal rule changes have been made by the FEC to close the loophole and Congressional action has not occurred. This is in part because many activist groups, including the progressive think tank the American Constitution Society for Law and Policy, still advocate for Internet political activity, other than paid communication, to be exempt from FEC regulation to protect citizen bloggers and Internet activists who also use YouTube to promote their causes (Enochs, 2007). While the specifics surrounding the controversy over federal definitions of Internet communication are beyond the scope of this study it is clear that the continued existence of the YouTube loophole allows content to be produced for the Internet that cannot be shown in traditional media.

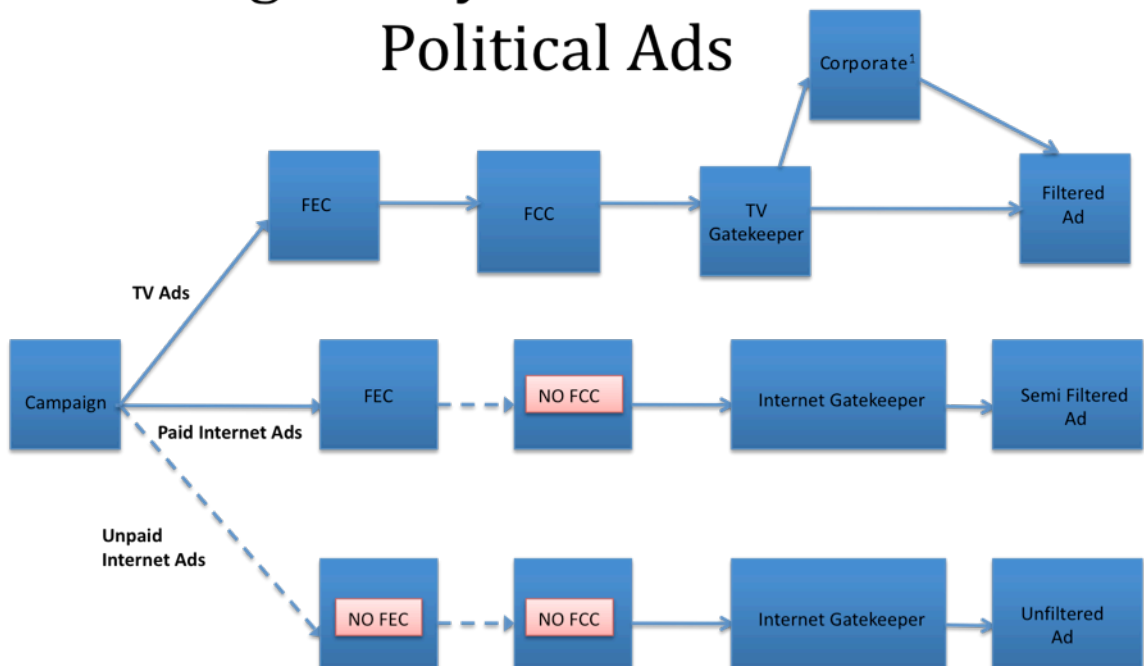
1.3 Impact of Political Advertising Regulatory Framework

This regulatory structure creates a framework where ads produced by the same campaign receive different levels of oversight based on the media used. As shown in Figure 1 below, the content in these ads receives different filters in different media and creates a scenario where messages not allowed in one media can be sent out through another. A TV ad is subject to FEC and FCC oversight as well as a review by a station gatekeeper, and on certain occasions, that station's corporate office. An ad uploaded to an Internet site for a fee is subject to FEC oversight only as well as review by a site gatekeeper. An ad uploaded to an advertiser-supported site for no

fee is not subject to any government oversight and is only reviewed by an Internet gatekeeper.

This difference in media regulation means that a campaign could upload an ad for free to YouTube, such as the *Vote Different* attack ad, that contains content the campaign would not be able to use for an ad run on a television station. Similarly, ads uploaded for a fee to a Web site may not be flagged by an Internet gatekeeper, in the same manner a TV producer would, because the Internet executive is under reduced federal oversight. This has the potential to allow egregious content to get out even when federal regulations are in place.

Regulatory Framework for Political Ads



¹If an ad is particularly high profile a TV station's corporate headquarters may also review before approval is given.

Figure 1 Regulatory Framework

Given the popularity and lower costs of YouTube, the development of similar video and video sharing sites by Microsoft, Yahoo and Fox Interactive and the explosion of Internet political ads during the 2008 cycle, political campaigns will surely increase the amount of

Internet advertising they produce over the next several election cycles. In the future, the Internet will represent a larger share of political advertising and the loopholes mean that a larger proportion of ads will be in effect unregulated.

To assess the current state of political advertising content and how the Internet has already affected it, this study attempted to assess current Internet advertising content, compare it to current content on television and determine whether or not any differences observed were due to differences in federal regulations between the media.

2. Literature Review

The relevant prior research in the field included an assessment of political advertising's impact on political messaging, voter awareness and public trust in government. Research conducted on the impact of the Internet on political campaigns in general and specifically on political advertising was also reviewed. These studies have found significant issues with regulated political communication in traditional media and indicate that less regulated Internet political advertising has the potential to enhance these negative impacts.

2.1 Advertising and Politics

Political advertising experts such as Kathleen Hall Jamieson, director of the Annenberg Public Policy Center at the University of Pennsylvania, and Jonathan Rose, a fellow with the Centre for the Study of Democracy at Queens University at Kingston, have argued that political advertising focuses on image over substance, reducing the quality of the information provided as well as voters' knowledge of candidates and issues. Jamieson (1993) claims that the focus of political advertising on "window dressing" instead of substance has led to a situation where "Campaign discourse is failing the body politic in the United States" (p. 11). Rose (1984) asserts that as advertising has increasingly become a key method of communicating political information to the public, it has effectively decreased discussion of issues to sound bites and equated selling public policies to selling hamburgers. Rose adds that, "If one of the assumptions of a democratic polity relies on an informed electorate, this latest trend may be worrisome... Ads do not attempt to enlighten but rather are intended to seduce, cajole or persuade through the

manipulation of images” (p. 2).

Several researchers have provided analytical support to Hall-Jameison and Rose’s points illustrating a significant use of negative advertising in recent elections. Kenneth Goldstein (1997) found that two-thirds of the advertisements produced by the two major candidates for president in 1996 were negative. Through a content analysis of television ads shown in the 75 largest media markets during the ‘96 general election, Goldstein found that 93% of William J. Clinton’s spots were either attack or comparative,⁴ and 86% of advertisements presented by Robert Dole fell into these two categories. Only 7% of Clinton’s ads and 14% of Dole’s were defined as positive, advocacy spots that promoted the goals and policies of the candidate.

Analyses of US Senate and Congressional races conducted by Lau and Pomper (2001) and Tinkham and Weaver-Lariscy (1990) have shown less use of negative advertising, but these studies still indicate that nearly 40% of the content in the campaigns studied were negative, either attack or comparative. Geer (2006) has also noted that while most political advertising research has focused on negative advertising, many positive advertisements in a campaign are often designed to mislead voters or do not provide all of the facts. He uses examples of advertising used by Ronald Reagan in 1984, which promoted his tax cuts without mentioning the large tax increase he signed into law, to illustrate the point.

The prevalence of negative and misleading advertising has been linked to decreased voter turnout (Ansolabehere et. al., 1994) reduced public mood (Rahn & Hirshorn, 1999), decreased political efficacy (Ansolabehere & Iyengar, 1995), and lower public trust in government (Chanley & Rudolph, 2000; Keele, 2007). Chanley and Rudolph (2000) argue that the actions of government leaders, including the way campaigns are run, directly impacts the trust the public

⁴ Attack ads are defined as spots that specifically disparage an opponent’s person or record. Comparative ads are spots that compare an opponent’s record to the candidate.

has in government. This lack of public trust causes the American government to be less effective in addressing public policy issues and efficacy in governing.

Keele (2007) enhances this point by noting that trust in governmental institutions, the President and Congress, declined by an average of 30 percentage points from the beginning of the 1950s to the end of the 1970's and then fell even further beginning in the late 90's. This decline in public trust aligns with a similar reduction in voter turnout from 1964 to 2008, 69% to 57% in presidential elections, with off-year elections declining from 47% in 1962 to 37% in 2006 (US Census, 2008; U.S. Elections Project, 2008). While Keele does not specifically link the decline in public trust he detected to political advertising, the decline he illustrates mirrors the rise of political television advertising that began in the 1950s. The data also aligns with the work of Ansolabehere, et. al. (1994), which linked the decline in trust and turnout to the rise of negative advertising in political campaigns.

This environment has developed in spite of the numerous federal regulations that have been created to promote accountability in political advertising, enhance accuracy and reduce negativity. In fact, the research presented above indicates that campaign messaging and advertising has become more misleading and less accountable over the last several decades even as the regulatory framework for political advertising has increased. Numerous campaign reforms that would reduce the negative impact of political advertising are now being debated, including public financing of campaigns (Public Campaign Action Fund, 2008) and requiring all campaign donations be anonymous (Ackerman and Ayres, 2004). However, the introduction of Internet communication, which is subject to reduced federal regulation and oversight, has the potential to further the negative effects already present in the current regulated environment even if reforms are implemented.

2.2 The Internet and Political Campaigning

G.S. Aikens undertook one of the earliest analyses of the impact of the Internet on political campaigning (1998). He studied Minnesota Electronic Democracy's (MN E-Democracy) efforts to enhance voter awareness and knowledge during the 1994 Minnesota state elections. Aikens directed the 1994 E-Debates for MN E-Democracy, which began as a central location to discuss state politics and then morphed into an interactive forum that was used by candidates to communicate information to voters. The analysis emphasizes how quickly the effectiveness and scope of Internet-based campaigning can increase as knowledge of the organization and the technology to make it feasible coincide.

Other scholars have investigated the use of the Internet in the presidential elections of 1996, (Reavy & Perlmutter, 1996), 2000 (Gibson et. al., 2003) and 2004 (Trammell, 2004), which, due to the advantages Aikens noted, show a steady increase in the use of the Internet for a number of communication and engagement activities, including recruiting volunteers and donors, providing information on candidate positions and, more recently, incorporating interactive features such as blogs, video content and podcasts. However, these studies have also shown that rather than enhance participation and increase understanding of campaign issues, Internet campaign activities have been used to enhance candidate image instead of engaging the electorate, which is consistent with the conclusions of Rose and Hall Jamieson regarding the use of traditional media in political campaigns.

Gibson et al. (2003) found that the use of the Internet by US political parties during the 2000 election focused on the presentation of information and messages through their main Internet sites while the use of participatory techniques, such as solicitation of comments through email, were limited. Also, despite the use of the Internet by numerous groups, Internet campaign

activities in 2000 were dominated by the major parties and candidates. The authors argue this is part of a larger trend where offline control of political messaging is being continued online, and reducing the democratizing impact of Internet communication. This is due to the offline marketing tools major candidates can use to draw viewers to their sites and the fact that these organizations have funds available to hire professional Internet managers to continuously create and update Internet content.

A few studies have also looked at the impact of negativity in Internet campaigning (Latimer and Trela, 2004; Foot and Schneider, 2006). It has been hypothesized that the Internet could be used similarly to direct mail to release negative messages without the scrutiny or high profile of TV advertising. Latimer and Trela assessed the negativity of Internet sites by the presidential candidates in the 2000 and 2004 elections and found that negative messages were generally present in the same percentage as found in traditional media. A case in point, they deemed 63% of the messages appearing on Al Gore's Web site in 2000 negative. They did note though that the wide divergence in site quality and lack of updated information on multiple sites reduced the impact of their results. They called for additional research to be conducted in future elections to assess whether the trends they observed intensified as Internet political communication became more sophisticated.

The above research indicates that political communication on the Internet contains the same negative traits as those observed in traditional political communication. In addition, with the lesser regulation of Internet political advertising by federal agencies, it is possible that these advertisements could become more negative, less factually accurate, and less accountable than TV ads.

2.3 Internet Political Advertising

Given the relatively new phenomenon of Internet political advertising there is little research on the content of these advertisements or their comparison to ads presented in traditional media. One of the few studies that touch on the area is an analysis of the use of coordinated email messaging by the George W. Bush and John Kerry campaigns during the 2004 presidential election (Williams, 2005). These message campaigns were used to activate supporters and to disseminate certain campaign messages, similar to how advertising has been used with traditional media. The study also found that these types of messages can be considered a form of viral marketing because they can be forwarded and disseminated widely without additional effort by their creator. This is similar to the video-sharing phenomenon where ads can be produced cheaply and then uploaded for free on advertiser supported sites such as YouTube and then disseminated by the broader Internet community. Interestingly, the analysis of Kerry and Bush email messaging showed that a majority of the messages were used to promote the candidate rather than attack the opponent.

This study builds on this prior research to provide a broader understanding of the impact of the Internet on political advertising and determine whether the content presented was different than that seen in television political ads, which has already been shown to often contain negative and factually misleading messages that are not accountable to the candidates producing them. It also sought to determine whether this difference in content was due to the reduced regulations present on the Internet. The data collected will provide further insight on how the Internet is changing political advertising and provide assistance to policy makers as current rules are modified to address Internet communication in political campaigning.

3. Research Question

This study assessed the differences in content between political advertising carried on the Internet versus TV, and whether regulatory differences are a significant factor in content differences.

R1. Is the content in Internet political ads different than TV ads?

R1a. Are political messages carried on the Internet ads more negative?

R1b. Are Internet ads less factually accurate than ads in traditional media?

R1c. Are Internet ads less accountable to the candidates who produce them?

R2. If there is a difference is it related to disparities in federal regulations that govern TV and Internet advertising?

4. Methodology

4.1 Introduction

Two methods were used in this study to measure the difference between content presented in political advertisements on the Internet versus content presented on television and to determine whether this difference was due to disparities in federal regulations for Internet and TV advertising.

The first method employed was a content analysis conducted on a sample of political campaign advertisements by the presidential candidates during the 2008 general election. The television and Internet ads were compared using the following three characteristics: negativity, accuracy, and accountability. These three criteria were chosen because federal government regulations have been designed to address these issues in political ads (Lamm, 2004). The results were used to answer RQ1 (Is the content in Internet political ads different than TV ads?).

The second method employed was a series of interviews with content gatekeepers. These interviews were conducted to validate the data collected in the content analysis. It also provided data to answer RQ2 (If there is a difference is it related to disparities in federal regulations between media?). Content gatekeepers are defined as those individuals at television stations and Internet media companies who make decisions on whether ads that are submitted by political campaigns will be approved for air. Specifically, these gatekeepers were asked if the content of ads from the study period meet the regulations and guidelines the gatekeeper is required to follow regarding political communication. Gatekeepers were also asked to describe the specific government regulations they are required to be aware of as it relates to political advertising content. This provided specifics on how the implementation of regulations related to political

advertising impacted the differences in TV and Internet ads. Table 2 shows a breakdown of the two methods, including the sample population, technique and research question answered. For the content analysis, a previous study by George Washington University that collected all advertisements in the 2008 election was used to collect the data. The ads were then viewed on You Tube. For both methods, a pretest was conducted during the proposal phase to assess the usefulness of the specific techniques and the success of each method in answering the research questions.

	Research Question	Population	Source	Technique ¹	Pre-Test
Method					
Content Analysis	R1	33 TV Ads 131 Internet Ads	George Washington University & You Tube	Content Questionnaire	10 TV Ads 10 Internet Ads
Gatekeeper Interviews	R1 & R2	2 TV 2 Internet	Rochester Television Affiliates, National Internet Companies	Short Interview	1 TV 1 Internet

¹ Both of the techniques were modifications of documents from the Wisconsin Advertising Project

Table 2 Methods Description

4.2 Political Advertising Data Collected

The data collected for this study was retrieved from a sample population of political ads presented in the 2008 general election for the Presidency of the United States. The sample

included 33 television advertisements,⁵ that were aired and 131 Internet ads,⁶ that were uploaded between September 5, 2008 and September 25, 2008. All ads aired by the campaigns during the time period were selected. The first date was the day after the end of the Republican National Convention and the second date was the day before the first televised debate between Barack Obama and John McCain. This time frame was selected because the period between the end of the national conventions and the beginning of the debates is considered by political experts to be the first third of the general election. This time period contains large percentage of the campaigns' marquee ads, which are used to set the campaign message for the general election and delineate these messages from those produced in the primary season. For example, in 2008 Barack Obama and John McCain, who used liberal and conservative messages respectively to win the primaries, developed ad campaigns that moderated their positions to attract moderates and undecideds (Davis, 2008). This time period also sets the campaign tone going into the debates, generally the most watched telecasts of the political season. The first presidential debate averaged 29.5 million viewers on broadcast television (Gorman, 2008). Given this, the first third of the general election can be used to make assumptions for the tone and content of political ads shown during the entire general election time period.

The television advertisements were collected from comprehensive databases developed by George Washington University's Democracy in Action project, which collected all political advertisements run by the candidates in the 2008 election. All ads aired during the time period were studied regardless of which television market they ran in. It was determined that during the general election period, as opposed to the primary season, the messages being shown in different states was similar enough to not be a factor in analyzing add content. All TV ads were viewed on

⁵ The source of the videos collected is the Democracy in Action Project at George Washington University.

⁶ The source of the Internet videos is YouTube.

YouTube by accessing the campaign channels created by each candidate. Obama and McCain both uploaded all of their TV ads to their individual You Tube channels.

For the Internet ads, content uploaded by the Obama and McCain campaigns to the video-sharing site YouTube were collected and analyzed. YouTube is the dominant video sharing media and can be used to approximate content on the Internet as a whole. It is the nation's top rated video site, visited by 66 million viewers monthly, nearly double its nearest competitor, according to Nielsen Net Ratings (Quinn, 2008). For October 2008 alone, 5.4 billion videos were viewed on YouTube, a nearly 40% share of all videos viewed on the Internet for that month (ComScore, 2008). Due to this dominance of Internet media, every major candidate in the presidential race created a YouTube channel, used to upload and categorize content on the site. The success of this strategy is exemplified by data collected by Internet research company TubeMogul, which indicates that videos uploaded to You Tube by Barack Obama during the entire 2008 election cycle had a "total watch time"⁷ of over 14.5 million hours. Equivalent airtime to broadcast this content on TV would have cost almost \$46 million (Sifry, 2008).

YouTube was also chosen due to the loophole in current FEC rules that exempt advertisements placed for free on advertiser supported sites, like You Tube, from federal content regulations governing political advertising. These standards currently only apply to paid advertising. Given this, and YouTube's dominate position among advertiser supported sites, it was felt that studying content on this site would provide the best evidence of content differences between TV and Internet political ads.

In choosing which ads to review, only ads for the two major party candidates, Republican John McCain and Democrat Barack Obama were chosen for this study. These two campaigns represent the overwhelming majority of campaign advertising spending and were the only

⁷ Total number of video hours of Obama's YouTube ads multiplied by number of views.

presidential candidates to run TV ads during the study period. Only advertisements produced and paid for by the candidates themselves, rather than third parties such as labor unions and political parties, was analyzed. This decision was made because third party organizations are subject to different regulations related to content than candidates and candidate committees. In addition, the sheer number of third party organizations and advertisements in the 2008 presidential primary election would have made collecting all content from these groups much more difficult. To ensure that only ads produced by the Obama and McCain campaigns were reviewed, TV ads collected were checked to ensure they included the appropriate *Paid-for-Icon*. Internet ads reviewed came exclusively from the candidate's YouTube channels, which each campaign controls. Federal law prevents campaigns from collaborating directly with third parties so these channels could not contain advertisements produced outside the campaign (FEC Electioneering Communications, 2004). Therefore, the data collected in this study addresses content differences between Internet and TV ads produced solely by McCain and Obama. Additional research should be conducted to determine whether the results hold for third party advertisements, non-major party candidates and for additional major party candidates in future election cycles.

The types of advertisements studied for the candidates chosen included produced advertisements for television, produced advertisements for use solely on the Internet, and additional video content produced for the Web, including taped press conferences and campaign events, Webcasts and documentary style coverage of the candidates.⁸ Each television advertisement was selected based on two criteria: it was shown at least once during the study period and was significantly different in content than other TV ads shown by the same candidate. Internet ads that were selected had to be uploaded to YouTube by a presidential campaign during

⁸ Produced advertisements refer to 30 and 60 second spots generally created for television. Obama and McCain both created Internet only spots that follow the same format.

the study period and had to be significantly different from other Internet ads. Internet and TV advertisements that were similar but were specifically produced for one medium or the other, based on the data available, were selected. But, TV ads that were uploaded to You Tube were not analyzed in the Internet category. A table of the candidates and the Internet and TV advertisements for each is shown in Table 3.

Candidate	TV Ads	Internet Ads	Candidate Total
Barak Obama	17	123	140
John McCain	16	8	24
Total	33	131	164

Table 3 TV and Internet Ads for McCain and Obama, 9-5 to 9-25

It should be noted that Barack Obama produced a far greater number of Internet ads than John McCain, while the TV ads produced by the two campaigns was nearly equal. This discrepancy was taken into account during the analysis portion of this study by assessing the differences in negativity, accuracy and accountability between McCain and Obama's TV ads. The results for all three were similar for both candidates. As shown in Figure 2, 10 of McCain's 16 TV ads, or 63%, were labeled heavy attack, while 12, or 71%, of Obama's 17 TV ads fell into this category.

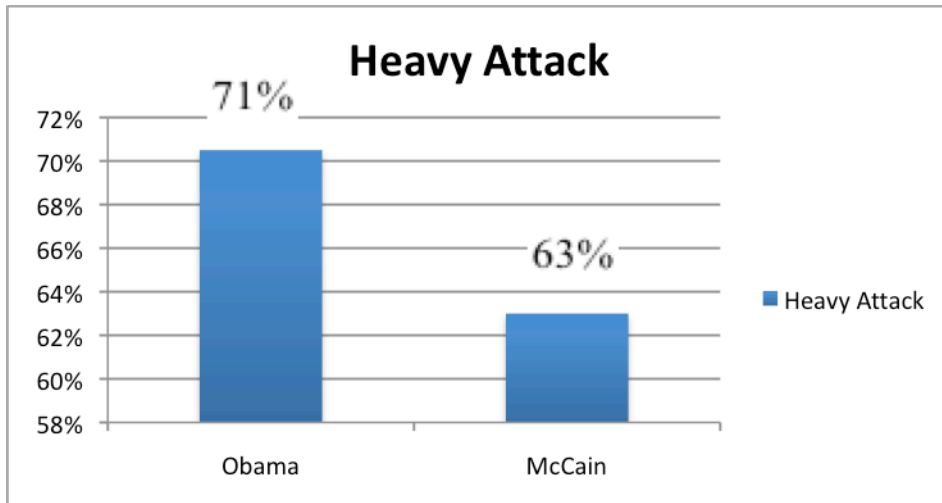


Figure 2 Heavy Attack TV ads by John McCain and Barack Obama

Similarly, 5 of McCain’s 16 TV ads, or 31%, included citation of statistics, a component of the accuracy measure, while all 16 ads included *Paid-for-Icons* and *I Approved Messages*, both part of the accountability measure. Six of Obama’s 17 ads, or 35% included citations, while all included paid for icons and *I Approved Messages*. Given these results, it was then assumed that the data for the Internet ads would be similar between candidates and that the larger number of Internet ads produced by Obama would not unduly skew the results.

4.3 Method 1 Content Analysis of Internet vs. TV Ads

The content analysis assessed all Internet and TV ads selected in the data set, and was conducted by the researcher. The ad content was assessed for negativity, accountability and accuracy. Since the analysis was based in part on the opinion of the researcher the second method, gatekeeper interviews, was used to partially verify the results of the content analysis.

4.3.1 Negativity

Negativity in this study refers to the tone of an ad and more specifically to the focus of the ad's content. Previous research on negativity in campaign advertising has developed several definitions for negative ads. Lau and Pomper defined negative ads simply as any advertisement that discusses the opponent (2001). The Wisconsin Advertising Project (2008) defines negative advertising as messages that contain specific "attack" language that it has identified based on previous analysis of campaign ads. Additional research by Jamieson and Waldman (1997) and Bartels, et al. (1998) has expanded the definition to differentiate between advocacy ads that focus on the candidate, comparative ads that present information on the records of the candidate and his/her opponent and attack ads that criticize or denigrate the opponent and his/her record. Given the desire to provide a broader understanding of the tone of ads than the Lau and Pomper definition could provide, this study used a combination of techniques from the Wisconsin Advertising Project and Jamieson and Waldman definitions.

An advertisement focusing solely on the candidate and his/her policies was termed an *advocacy ad*, an ad which compared the policies or record of a candidate to his/her opponent was termed a *comparative ad*, and an ad that focused on attacking an opponent or policy was termed an *attack ad*. Negative word connotations and images present in each attack advertisement were also collected. Negative words and images in this context refer to phrases and/or video footage used to degrade an opponent or inflame opinion on an issue. Examples include "gutless politicians," "spineless politicians" and "decades of division and gridlock."

A coding system was developed based on these categories whereby an advocacy ad was coded as a 1 and a comparative ad was coded as a 2. For this study, ads that specifically

compared a candidate's policies to current policies, such as the energy program of the Bush administration, were labeled comparative and coded a 2. However, ads were labeled advocacy and coded a 1 when general reference was made to a policy, i.e. "the failed policies of the past," but the totality of the content focused on the candidate producing the advertisement.

Attack ads were originally coded a 3 but during the pretest done for this study it became apparent that there were additional levels of negativity in attack ads based on whether the candidate and his/her policies appeared in the ad and how negative words and images were used. In addition, a finer tuned negativity measurement was deemed necessary to better determine whether TV ads are more or less negative than Internet ads. Therefore, attack ads were broken into three sub codes. Ads were labeled 3a if the candidate appeared in the advertisement, leveled the attacks on the opponent or policy and if the ad contained no negative images. Ads were labeled 3b if the attacks on the opponent or policy were leveled by a third party or narrator and included negative images, but also included a presentation of the candidate's position. Ads were labeled 3c if the ad focused solely on an attack, with no candidate positions, if the candidate only appeared briefly in the ad or not at all, and if the main body of the ad is devoted to negative images. A breakdown of the coding system, with an example of each is presented in Table 4.

Code	Description	Example
Advocacy (1)	Focused on the candidate and his/her policies	John McCain, “Original Mavericks” 09/08/08 http://www.youtube.com/watch?v=bVIaqCjvLpU
Comparative (2)	Compares the candidates policies with his/her opponent	Barack Obama, “Plan for Change” 9/17/08 http://www.youtube.com/watch?v=ONM7148cTyc
Light Attack (number?)	Focus is to attack an opponent or a specific policy with limited negative words and images	Barack Obama, “On Change” 9/06/08 http://www.youtube.com/watch?v=oSmn25rvQRo Obama appears and makes the attack himself.
Medium Attack (#)	Focus is to attack an opponent or a specific policy with moderate negative words and images	Barack Obama, “Register to Vote in Michigan by Oct. 6!” 9/12/08 http://www.youtube.com/watch?v=94TMmc50WAw Narrator makes attacks and ad includes some negative images but also has Obama policy positions.
Heavy Attack (#)	Focus is to attack an opponent or a specific policy with high use of negative words and images	John McCain, “Jim Johnson” 9/19/08 http://www.youtube.com/watch?v=Aq7DGTggpx0 Straight attack on Obama using numerous negative images. McCain only appears at the very beginning of the ad.

Table 4 Negativity Codes

4.3.2 Accountability and Accuracy

Accountability, refers to whether or not it is easy to determine who paid for the advertisement and which candidate the ad is promoting. For this study, accountability was measured by determining whether the ad included an icon denoting who paid for the ad and whether the candidate can be heard or seen approving the advertisement, for example, “I am

Barack Obama and I approved this message.” Both of the above are required by the FEC for all television advertisements and for ads placed for a fee on a Website. They are not required for ads uploaded for free on advertiser supported sites such as YouTube, and will be an important factor in measuring the difference between TV and Internet ads. The accountability review also included whether or not the candidate appeared in the ad and whether or not the candidate’s Internet site is featured.

Accuracy refers to whether the information provided in an advertisement can be perceived as factual. This was accomplished by reviewing whether the information was easily verifiable through the citation of facts and statistics presented. For example, an ad in which a candidate said, “I sponsored the Family and Medical Leave Act” would include a citation related to the fact such as a bill number or newspaper article. Accuracy was also measured through verifying an advertisement’s use of third parties, people or organizations other than the candidate or campaign used in an ad to promote the candidate. Here, all third parties used in an ad were researched to ensure that the person or entity presented in the ad is supporting the candidate. For example, if a quote from a newspaper supporting the candidate was used, the researcher verified whether or not the newspaper had endorsed the candidate. It should be noted that this category did not attempt to verify that ALL information in the advertisement was truthful, but to determine whether or not facets of the advertisement could be deemed misleading. This category was used to assess the difference in how information is presented in TV and Internet ads and gauge whether the use of citations and third parties is more or less likely in one media or the other.

All facets of the accountability and accuracy categories were measured using a yes/no dynamic. If the facet, such as a paid for icon, existed in the ad a yes was recorded, if it did not a no was recorded. For the accuracy section it was also recorded whom the statistics used in the ad

referred to (the candidate, the opponent, or both), and whether the third party present in the advertisement was a person or an organization. A breakdown of the accountability and accuracy categories is presented in Table 5.

Accountability (Code)	Accuracy (Code)
Does a paid for by icon appear? (Y/N)	Are statistics/facts cited? (Y/N)
Does an “I approved this message” voice over occur? (Y/N)	Do the statistics/facts refer to the candidate or opponent? (C/O/Both)
Does the candidate appear? (Y/N)	Are people/organizations other than the candidate or his opponent used in the ad? (Y/N)
Is the campaign Internet site visible? (Y/N)	Is the party referenced a person or an organization? (P/O)
	Is it clear that the parties in the ad are supporting the candidate? (Y/N)

Table 5 Accuracy and Accountability Codes

4.4 Method 2 Gatekeeper Interviews

The second method included a series of interviews with content gatekeepers to ascertain whether specific Internet content could be run on television. These gatekeepers, executives at Internet companies and TV stations who approve political ads for air, were shown selected Internet content and asked if these ads could be run in their media, Internet or television, and if not why not? The gatekeepers were asked to base their answers specifically on content, as opposed to length or production style.

For this method, four gatekeepers were selected: two from TV stations and two from Internet media companies. Prior to the gatekeeper interview, the researcher selected two ads

produced for the Internet. During the interview the gatekeeper was first asked to review the ad and then whether or not the ad could be shown in his/her medium. If the answer was no, the gatekeeper was asked to describe the specific issues that would prevent airing related to the ad's negativity, accountability and accuracy. Finally, the gatekeeper was asked what government regulations he/she was required to follow related to political advertising. A breakdown of the general questions is presented in Table 6.

Questions	
<i>Question 1</i>	Would this advertisement be permissible on your station/site?
<i>Question 2</i>	If not, are the reasons related to the ad's accountability, accuracy and/or negativity?
<i>Question 3</i>	What government regulations related to advertising impact your decision?
<i>Question 4</i>	What federal agencies monitor your airing of political advertising?

Table 6 Gatekeeper Interviews

Advertisements the gatekeepers reviewed were chosen based on how they illustrated the characteristics being studied. For example, ads that were produced for the Internet that did not include *Paid-for-Icons* or Internet ads that were coded Heavy Attack were selected to see if the same ad could have been run on television. These outlier advertisements were used to analyze whether or not content that could not be shown on television, due to government regulation or the norms of television advertising, is getting out via the Internet.

5. Results

The study found that content in Internet ads *is* different than TV ads. Specifically, the Internet advertisements studied were less accurate and less accountable than the TV advertisement, as presented in Research Question 1b and 1c, shown in Table 7 below. In the accuracy measure, not a single Internet ad contained citations for the statistics used, while nearly 40% of the TV ads with statistics presented citations. As a measure of accountability, John McCain and Barack Obama appeared in all of the TV ads but they appeared in less than 40% of the Internet ads.

For the negativity measure, the content in Internet Ads was deemed different than TV ads. However, in contrast to the other research questions Internet ads were found to be more positive than TV ads. Sixty-seven percent of TV ads were coded as a 3C, the most negative or attack ad, while only 5% of Internet ads fell in the same category. Similarly, 27% of TV ads were positive or comparative, coded 1 or 2, while 75% of Internet advertisements were coded as positive or comparative.

Through the gatekeeper interviews these differences were shown to be based in part on differences in regulations governing Internet and TV political advertising as proposed in Research Question 2: Are the differences in Internet and TV ads based on differences in regulation?

Research Question #	Hypothesis	Is Hypothesis Supported? Yes/No
R1	The content in Internet political ads is different than TV ads.	Yes
R1a	Political messages in Internet ads are more negative.	No
R1b	Internet ads are less factually accurate.	Yes
R1c	Internet ads are less accountable to the candidates who produce them.	Yes
R2	The difference in content is related to the lack of regulation of the Internet?	Yes

Table 7 Summary of Results for Hypotheses

Specifically, the differences noted in accountability were deemed to be based on differences in regulation between Internet and TV advertising. *Paid-for Icons*, which indicate who paid for an ad, and *I Approved Messages*, where the candidate is required to appear and state he/she approved the content of the ad, are required by federal statute for all TV ads and ads placed for a fee on a Internet site. These accountability measures are not currently required for political advertisements presented on YouTube because the producer of the ad can upload the video for free on this advertiser supported site. During the study period, *Paid-for Icons* were only present in 46% of You Tube ads studied while *I Approved Messages* were only in 5% of the YouTube ads.

All of the TV producers interviewed for this study indicated that the Internet advertisements they were shown could not run on their stations specifically because the ads did not include a *Paid-for-Icon* and an *I Approved Message* from the candidate. The gatekeepers are required to confirm that all ads they run contain these two measures, a stipulation that is enforced by the FCC in television advertising. The television gatekeepers did note that the negativity and accuracy of the ads they were shown would not have prevented them from being aired. This was because they had specific requirements related to accountability they needed to follow but had more leeway related to accuracy and negativity.

For the accountability measure, the gatekeepers further noted that their review of political ads is closely monitored by their parent companies to ensure compliance. One said that he/she receives a 200-page booklet each year from corporate headquarters outlining specific rules he/she needs to follow related to political advertising. Another noted that specific high profile ads may be subject to corporate review before the local station can run it. The TV gatekeepers indicated that the regulations and rules they followed were primarily enforced by the FCC, which runs the federal licensing system for TV stations. They did not generally interact with the FEC, which focuses its regulatory efforts on campaigns.

In contrast to the TV gatekeeper interviews, the Internet gatekeepers indicated the same ads that were shown to the TV gatekeepers could run on their sites as-is and that they were not required to review or confirm content by any federal regulation or entity. Furthermore, both Internet gatekeepers noted that they leave all responsibility for meeting federal regulations to the campaigns producing the ads. This was noted both for Web sites that require fees to upload advertisements as well as sites that do not. This was deemed to be due in part to the fact that Internet companies are not regulated by a federal entity such as the FCC. In Internet advertising,

even paid Internet advertising, the FEC is solely responsible for regulation and only has jurisdiction over the campaigns producing the ads not on the media companies that run them.

The results from the content analysis and the gatekeeper interviews are presented below. Following that is a presentation of the gatekeeper interviews for both the television and Internet executives contacted for this study.

5.1 Findings from Method 1: Content Analysis

The content analysis reviewed Internet and TV ads produced by the campaigns of Barack Obama and John McCain between September 5th, the day after the end of the Republican Convention, and September 25th, the day before the first televised presidential debate. Data was collected on each advertisement's negativity, accountability and accuracy as described in the methods section. The data for the three main criteria used to answer the first research question of this study, is the content in Internet political ads different than TV ads, are presented below.

5.1.1 Accountability

The accountability of each advertisement was measured by four variables: 1) the presence of a *Paid-for Icon*, 2) the presence of an *I Approved Message*, 3) whether or not the candidate appeared in the ad, and 4) whether or not the candidate Internet site appeared in the ad. Three of the four criteria indicated substantial differences between Internet and TV ads studied while three of the four also correlated with regulation differences between the two media.

Each advertisement was assessed to verify whether or not a *Paid-for-Icon* appeared in the ad. The icon indicates the political campaign that produced and paid for the ad. It was chosen as a criterion to assess accountability because it is required for all television advertisements and ads placed for a fee on an Internet site by FEC and FCC regulations. The icon is not required for ads uploaded to You Tube by political campaigns. For this criterion, there was a substantial difference between the TV and Internet ads studied. 100% of the TV ads contained the *Paid-for-Icon* while only 46% of Internet advertisements featured it. The lack of a paid for icon was one of the two main factors cited by the TV gatekeepers, along with the lack of an *I Approved Message*, that would have prevented them from airing the Internet ads they reviewed. A graph comparing Internet and TV ads on this measure is featured in Figure 3.

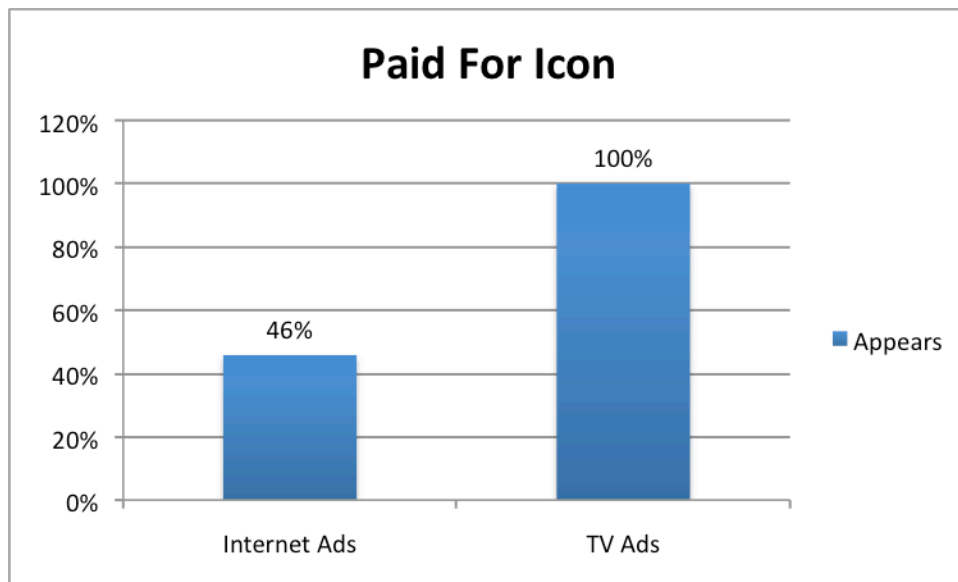


Figure 3 Results for *Paid-for-Icon* Measure

The differences between Internet and TV ads related to the *I Approved Message* were even starker. Only 5% of the Internet ads had an *I Approve Message*, while 100% of the TV ads contained it. Similar to the paid for icon, a message from the candidate approving the advertisement, “I am Barack Obama and I approved this message,” is required by the FEC for all

TV ads and ads placed for a fee on a Internet site. It is not required for YouTube ads. This stipulation also means that the candidate is required to appear in all TV ads. In the YouTube ads, where this is not required, candidates appeared in less than 40% of the ads. As mentioned above, gatekeepers noted the lack of an *I Approved Message* as one of the main reasons they would not be able to run the Internet ads they reviewed. A comparison of this criterion is presented in Figure 4.

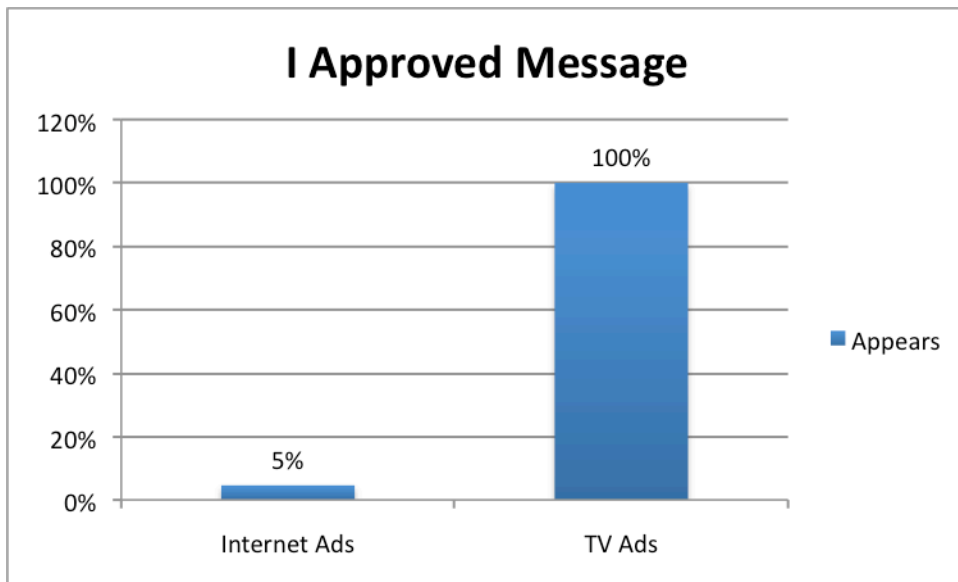


Figure 4 Results for I Approved Measure

The content analysis also assessed whether or not the ad contained the Internet site address of the candidate producing the advertisement. This criterion was included because it gives people viewing an ad easy access to additional information about the candidate and his/her policies and provides additional accountability. The inclusion of an Internet site address is not required by current federal statute. Through the content analysis no substantial difference was found between Internet and TV ads related to this measure. As shown in Figure 5 below, 64% of TV ads contained an Internet site address while 50% of Internet ads included it.

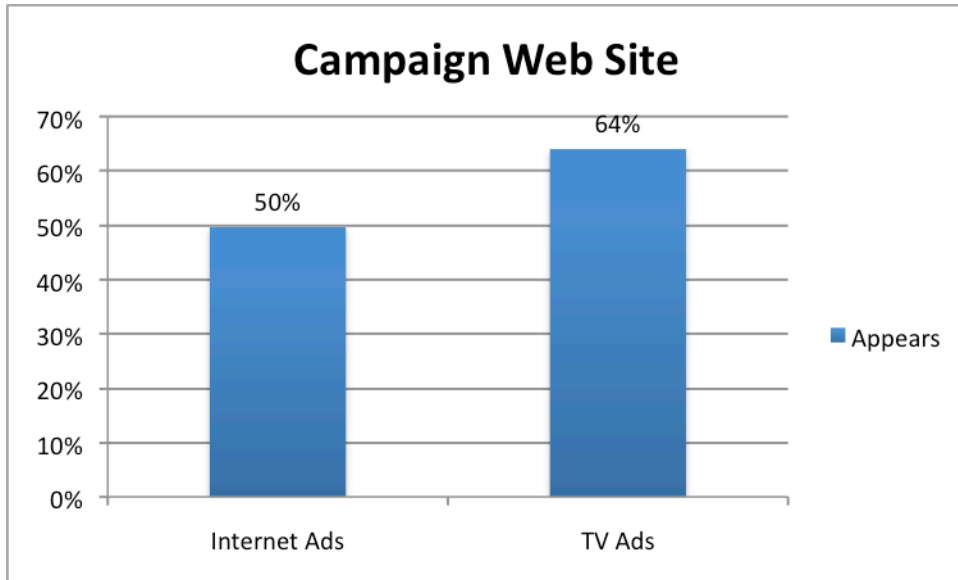


Figure 5 Results for Web Site Measure

The accountability measure of the content analysis proved to be the most conclusive in proving its hypothesis. In nearly every measure Internet content was less accountable than TV ad content, due in large part to the fact that most of the accountability measures studied were tied to specific federal regulations. Where those regulations were not required, as on You Tube, candidates and campaigns chose to present content that did not follow federal accountability regulations related to *Paid-for-Icons* and *I Approved Messages*. Interestingly where federal regulations were not required, such as in the inclusion of a campaign Internet site, the Internet and TV content were similar. Under the current rules therefore, campaigns are now able to produce content, through YouTube, that would not be permissible in other media, countermanding the intent of regulations related to political communication.

As stated earlier in this study, accountability measures were put in place by federal statute to enhance the voters' ability to know who was responsible for the messages being presented. The *Paid-for-Icon* allows voters to clearly identify who is producing and paying for the advertisement, while the *I Approved Message*, which requires candidate appearance, directly

links the ad with the candidate. One of the TV gatekeepers noted that in both Internet ads they viewed, it was not possible to tell who produced the ads. In addition, the same gatekeeper indicated that he/she believed that enhanced accountability promoted greater accuracy and less negativity in campaign advertising because campaigns were forced to take credit for the messages they produced. While this study did not attempt to link findings in accountability to accuracy or negativity, the accountability and accuracy measures not required by federal law were substantially lacking in all of the ads studied, both TV and Internet. However, the lack of accountability did not adversely impact the negativity of the ads studied, as the Internet ads were substantially more positive than the TV ads. Future research will need to be undertaken to determine whether or not the lack of accountability seen in Internet advertising can be linked to lesser accuracy or higher negativity.

5.1.2 Accuracy

The accuracy of the advertisements in the content analysis was assessed through two measures: 1) were statistics presented in the ad cited; 2) are third parties, people other than the candidate shown in the ad, endorsing the candidate. The statistics measure clearly indicated a difference between Internet and TV ads, but the gatekeepers interviewed indicated ad accuracy was not a factor in their content review. The third party measure however indicated that it was easier to tell if third parties in an ad were endorsing the candidate in Internet advertising.

The citation of statistics in TV advertisements is generally undertaken to provide credence to the statements made and to prevent possible cases of libel or slander. For example, an ad stating that a candidate voted against a certain bill would include the bill number and date of the vote. This is a norm followed for both political and general product advertising on

television. Given the lack of norms in Internet communication it was hypothesized that there would be less citation of statistics in these advertisements. The content analysis did show a substantial difference between Internet ads and TV ads in this area, as none of the Internet ads contained citations. However the citation of statistics in the TV ads studied was considerably less than had been anticipated with 38% of the ads containing citations. This may be due to the lack of specific regulation in TV advertising for this area as opposed to the accountability measure. A breakdown of citations for TV and Internet ads is presented in Figure 6. The TV gatekeepers interviewed noted that the accuracy of the Internet ads was not a factor in why the advertisements reviewed could not be run on their station. Multiple gatekeepers did indicate though that if an ad contained a statistic or fact that was deemed particularly incendiary they would conduct a fact check or run the ad by their corporate representative. But this was a rare occurrence.

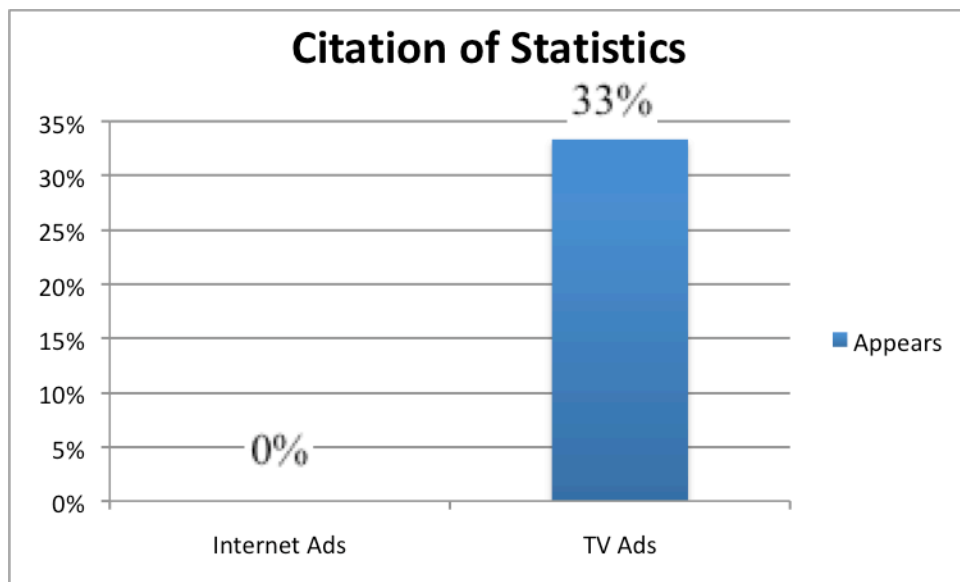


Figure 6 Results for Citation of Statistics Measure

Statistical citations provide greater credence to the information presented and are presented regularly in general product advertising on television, due to television norms developed to prevent instances of libel and slander. The lack of any citations in the Internet ads studied could be linked to the lack of accountability in Internet advertising as well as the lack of norms on the Internet that are present in TV advertising. It is interesting to note that the number of TV ads providing statistics was significantly less than had been hypothesized, a fact that may be based on the lack of regulations requiring this in TV political advertising. Future research should address these assumptions and provide a clearer picture on the impact of this measure in political ads.

The appearance of third parties in advertisements is generally used to provide additional credence to a candidate or a message. For example, a person running for elective office in a district with a lot of union members may produce an add featuring all of his union endorsements. In television advertising the use of third parties is more tightly controlled due to industry norms and fears over lawsuits, which prevent the use of people or organizations in ads without their permission. Given the lack of norms on the Internet it was hypothesized that Internet advertising could contain greater use of third parties without their permission or without clear indication they were endorsing the candidate. The data, shown in Figure 7, indicated this was not the case.

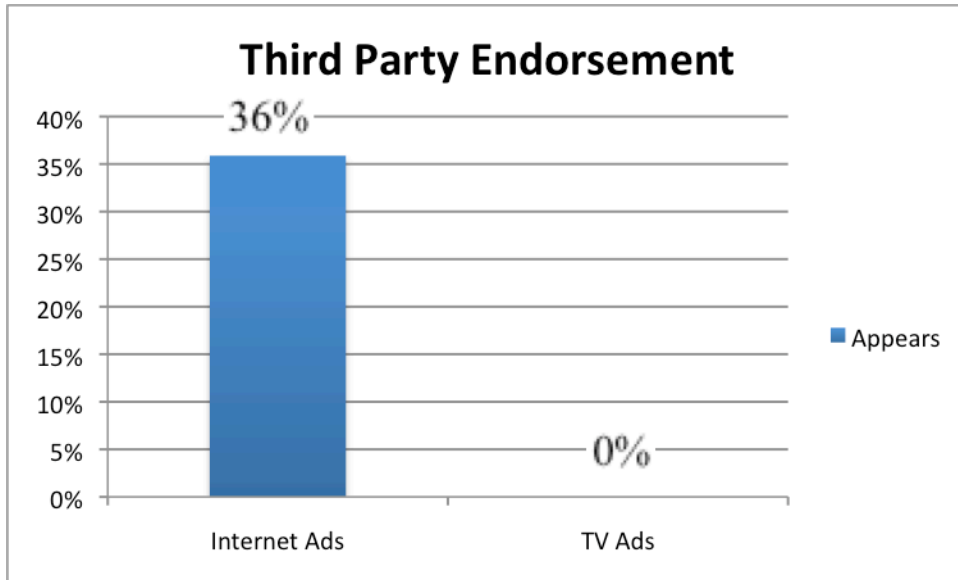


Figure 7 Third Party Measure

None of the TV ads containing third parties included clear endorsements. In contrast clear endorsements were present in 36% of Internet ads containing third parties. As mentioned above, the TV gatekeepers indicated the accuracy of an ad was only reviewed in particularly egregious circumstances so the presence of third parties in an ad is generally not a focus.

The accuracy measure related to third parties on first review seemed to indicate that it was easier to identify support in Internet ads. However, the original definition of third parties included newspaper articles that were used in an ad. This was done due to the belief that the inclusion of a newspaper masthead would give the impression that the paper had endorsed the candidate. Through the analysis it became clear that in the TV ads the main purpose of the newspaper articles used was to provide a citation for a fact or statistic used. When newspaper articles used in this fashion are removed only one of the 33 TV ads studied contained a third party. On the Internet, third parties were used considerably but this was due in part to the different types of ads used in this media. Third parties were shown in most of the edited clips of events, usually introducing the candidate, and in many of the volunteer recruitment and

fundraising spots, urging supporters to join them in working for the candidate. Given these factors, the data collected for this measure was determined to be inconclusive. Future research should develop a better definition of third parties and a more robust method for analyzing the possible differences between Internet and TV ads.

5.1.3 Negativity

The negativity of the ads studied was assessed through a 1-3c coding system as described in the methods section. Through the preparatory research for this study and the pretest, it was hypothesized that Internet ads had the potential to be more negative than television ads due to the lack of government regulation and oversight and the decreased industry norms present in this media. Studies have also hypothesized that Internet political communication would take the place of direct mail as the location for particularly negative content, because it is cheaper and easier to disseminate but less high profile than TV advertising (Latimer and Trela, 2004). However, the content analysis indicated that Internet advertising in the study period was actually more positive than TV advertising. As shown in Figure 8 over two thirds of the TV ads, 67%, were coded as heavy attack, 3c, where the ad contained heavy negative images and the candidate only appeared briefly at the beginning of the ad. In all, 73% of the TV ads were negative, either 3a, b, or c. In contrast, 75% of Internet ads were either positive, coded 1, or comparative, coded 2. And while a quarter of the Internet ads were still negative, 18% were coded 3a where the attack was presented by the candidate and included little or no negative images.

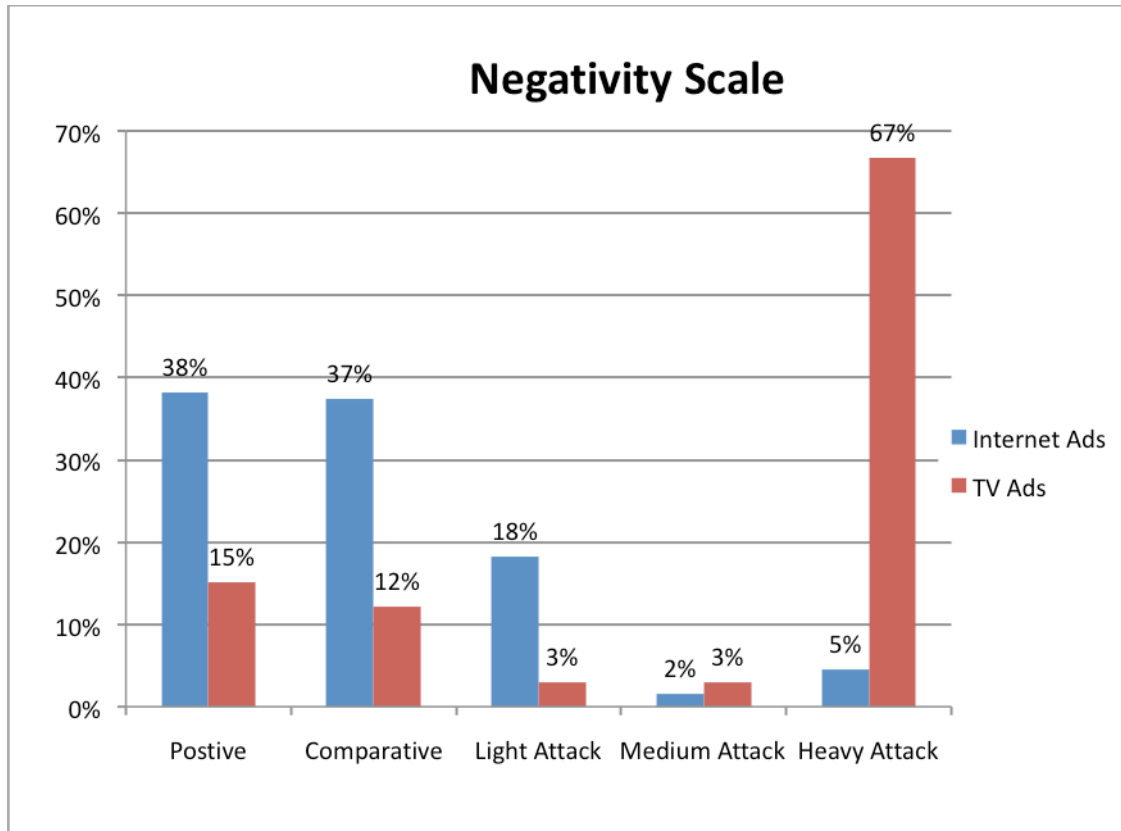


Figure 8 Results for Negativity

The negativity measure of the content analysis proved to be the most surprising finding of this study. The 30 second or 1 minute spots used in TV advertising lent themselves to the use of multiple negative images and the need to present direct information quickly, often enhancing the “punch” and attack nature of these ads. In Internet advertising, the greater variety of ads, both in type and in length, led to a greater variety in tone. For example, all of the recruitment ads were coded as positive or comparative as they focused on enthusing supporters instead of attacking the opponent. Edited clips of events often included negative content but given the expanded length of these pieces, which reduced the impact of the negative portions, and the lack of negative imagery none were coded worse than light attack or 3a. In fact, the only Internet ads coded as heavy attack or 3c were the several “TV style” 30 or 1 minute spots. Therefore based on the

sample, Internet advertising is not only less negative than TV advertising, it seems to not utilize the same negative style in production that TV ads have followed.

Also, Google, which owns You Tube, has specific internal policies that prevent political ads from running on their sites that include personal attacks of an opponent (Levy, 2008).

YouTube also utilizes a user community to regulate content on the site and specific videos that are deemed overly graphic or violent can be flagged or even removed. While these policies do not prevent all negative content from appearing it could be partially responsible for the lack of heavy attack ads in the You Tube sample. For example, Republican candidate Tom Tancredo produced an extremely negative advertisement during the 2008 presidential primary. It ran nationally on multiple television stations, but was flagged by the You Tube user community as unsuitable for minors.

The reasons behind the differences in negativity between TV and Internet ads are complex and beyond the scope of this study but as related to the research question it can be said that the negativity of Internet advertising is substantially different than TV advertising. Future research will need to address whether or not the differences observed in this research hold in other campaigns and whether or not more negative content moves to the Internet as political advertising in this medium matures.

5.2 Findings for Method 2: Gatekeeper Interviews

The gatekeepers verified the content analysis by noting similar differences in content between the TV and Internet ads they viewed. All TV gatekeepers indicated the Internet ads they were shown could not be run on their stations because they did not meet federal guidelines required for TV political ads, while Internet gatekeepers said all ads viewed could run on their

sites with no changes. This showed that content differences between media were based on differences in regulation.

5.2.1 TV Gatekeeper A

A sales manager responsible for reviewing political ads at a Rochester, NY TV station was shown the two preselected advertisements, which had been uploaded to You Tube during the study period, and then asked whether the ads would meet the standards required for airing on his/her station. The sales manager indicated the ads could not be shown because neither denoted who was paying for the ads. He/she noted that the identification of who is responsible for the advertisement, and who is accountable, was the primary responsibility of the TV station showing the ad. This stipulation is required by FCC standards related to political advertisements on television. On top of the advertisement itself, the sales manger said all paperwork related to the ad, including contracts, rates, official titles of the organizations paying for advertisement and whether the ad was accepted for air, are considered public information under FCC guidelines, and must be made available for citizen review upon request. The sales manger indicated the reason was to provide greater transparency on the production of political ads, thereby increasing the accountability to the candidate paying for the piece. It should be noted that the sales manager is only one component of a four-step approval process for a political advertisement at this station. The ad is also reviewed by the billing department, production staff and in some circumstances the station's corporate office and any of these entities can prevent an ad from being aired.

The sales manager did indicate that the negativity and accuracy of the advertisements shown were not a factor in his/her decision, as they are not generally considered as part of the approval process for ads. The onus for both is held by the campaign and the agency that created the advertisement. However, under certain circumstances, particularly negative ads or ads that are believed to have accuracy issues, advertisements may be flagged by the TV producer or by the station's corporate office. However, the sales manager indicated these instances are rare.

He/she did not note any regular interaction with the Federal Elections Commission. The main federal agency his/her station dealt with was the FCC.

5.2.2 TV Gatekeeper B

A sales executive at a local TV station in Rochester, New York viewed the same two Internet advertisements as Gatekeeper A and indicated they could not run on his/her station. The specific reasons given were because the ads did not contain a *Paid-for Icon* denoting who paid for the advertisement or an *I Approved Message* from the candidate approving the content of the ad. The gatekeeper noted he/she is required to confirm that both of these are present in all ads run on his/her station because it is monitored by the FCC and by the station's corporate office. At his/her station, there is also a large staff involved in reviewing and managing political advertisements including persons dealing with contracts, billing and approvals. Management reviews all particulars related to an individual ad prior to air to ensure all regulations and rules are followed.

The gatekeeper noted he/she receives a 200-page booklet each year from the station's corporate offices denoting all policies and requirements for political advertisements. He/she also

receives materials from the National Broadcasters Association, a national trade association, designed to assist individual stations in conforming to FCC rules and regulations related to political advertising.

The gatekeeper did indicate that the accuracy and negativity of an ad were not his/her prime focus. However, if an ad was deemed particularly negative or if it contained content that could be factually suspect the gatekeeper or his/her staff did fact check ads to confirm the information presented. This executive also did not note any specific interaction with the FEC.

5.2.3 Internet Gatekeeper A

A sales executive at an Internet company that solicits political advertising reviewed the same two advertisements and indicated they could run on his/her site. He/she noted that the ads conformed to the internal policies of his/her company and that the company did not specifically review federal regulations related to advertising content as part of their decision making process. The company left this task up to the individual campaigns and the advertising companies producing the ads. The executive noted no interaction with the FCC or with the FEC in creating procedures and rules related to political ad content or approval. It should also be noted that the company runs Internet sites that require fees for advertisements, which would then fall under FEC rules, as well as sites that do not require fees, and therefore do not need to conform to accountability standards required for paid sites and TV ads.

The Internet executive did note that his/her company had developed a review process and policy framework for political ads but that process had been driven internally with no external oversight by a federal entity, as is present in TV advertising. The company does have internal

standards in place related to ad content. This includes the prohibition of personal attacks aimed at an opponent in any advertisements run on company Internet sites. In this respect, then, the Internet company's own internal rules related to negativity are stronger than those used by the TV station gatekeepers interviewed for this study. The gatekeeper's company policies do not specifically address the accuracy of ad content.

5.2.4 Internet Gatekeeper B

An executive at an Internet company responsible for reviewing advertisements for upload was shown the same two ads and asked whether or not they could run on company sites. He/she indicated the ads conformed to the company's advertising policies and could run on its sites. The gatekeeper noted that the company conducted an internal review of content prior to the upload of a political ad, but this process did not include oversight by a federal entity, either the FCC or FEC. The company leaves all issues related to federal regulation compliance to the campaigns.

The executive did indicate that the company continually reviews and updates their advertising policies based on user and customer feedback and legal considerations. These policies were fairly comprehensive including guidelines on content, style and proper use of trademarks. However, specific rules of the FEC related to accountability, billing or public information were not part of this process.

The executive's company owns Internet sites that require fees for advertisements that are uploaded and sites that do not require fees. He/she indicated no difference in the approval process between these sites or in how the company dealt with federal rules. In both instances it was indicated compliance of FEC rules related to accountability were left to the campaigns.

Gatekeeper	Could they show Ads?	Reason
TV Gatekeeper A	No	Did not include Paid for Icon and I Approved Message. (Required to verify by federal law and enforced by FCC)
TV Gatekeeper B	No	Did not include Paid for Icon and I Approved Message. (Required to verify by federal law and enforced by FCC)
Internet Gatekeeper A	Yes	No governmental or corporate regulations prevented him/her from airing ad.
Internet Gatekeeper B	Yes	No governmental or corporate regulations prevented him/her from airing ad.

Table 8 Gatekeeper Interviews

As shown in the Table 8 above, the gatekeeper interviews enhanced the findings of the content analysis and proved that the differences noted between media were related to federal regulations. Specifically, TV gatekeepers are required to follow accountability measures that are set in federal statute, while ads placed for free on advertiser supported Internet sites such as YouTube do not currently have to follow the same rules. The interviews also indicated a stark difference in how gatekeepers in the two media reviewed and approved advertisements. This difference was also due to differences in regulations governing TV stations and Internet companies.

All TV gatekeepers indicated the Internet ads they were shown could not run on their stations while all Internet gatekeepers said the ads could run. The TV gatekeepers specifically rejected the Internet ads because they did not include Paid-for-Icons or *I Approved Messages*, accountability measures required by federal law. It was surprising that the sole criterion that led TV gatekeepers to say they could not run an ad dealt with accountability. Except in extreme circumstances, TV gatekeepers do not review the accuracy and negativity of an ad, a fact that was not anticipated prior to conducting the interviews. All of the TV gatekeepers indicated they

focused on accountability because they were required by federal law to review for this criterion and had much more leeway related to accuracy and negativity.

The TV gatekeepers also indicated they had to follow a complex, multitier approval system for ads that included considerable oversight both from within the TV station itself and corporate headquarters. This process included approval by multiple departments, including billing, sales and production, to ensure the ad in question met all requirements. Gatekeepers added that these procedures were in place in part to prevent negative action by the FCC, which controls licensing for TV stations, if an accountability measure was missed. The FCC provides a second check on political communication on television by enforcing and overseeing federal accountability measures in political ads, enhancing the work of the FEC, which focuses their enforcement efforts on campaigns.

This component is particularly important when comparing TV gatekeepers to those at Internet media companies because there is no parallel licensing structure for Internet communication. Internet gatekeepers indicated the approval system for ads was much less involved and did not include a specific review to ensure federal regulations related to political advertising were followed. These gatekeepers indicated that all regulations related to political advertising were left to the campaigns themselves and that they were not required to do otherwise by any federal law or entity. Due to this lack of jurisdiction, the FEC has focused its enforcement efforts in Internet political communications on the campaigns themselves and has not attempted to make Internet companies follow accountability measures for political advertising.

6. Conclusions

6.1 Relation to Other Research

The study confirmed a number of points developed by previous researchers in the field. The negativity of the television ads was comparable to past studies of negativity, and was nearly equal to the assessment done by Kenneth Goldstein (1997) of the 1996 presidential election between Bill Clinton and Bob Dole. Goldstein labeled 89% of advertisements as comparative or attack compared to 85% in this study. In addition, the sheer number of heavy attack ads, 67%, seen in the TV advertising promotes the views of Kathleen Hall Jameison, Jonathon Rose and Stephen Ansolabehere that negative attack advertising is the dominant form of communication in traditional political campaigning.

However, the large number of positive ads in the Internet sample, 38% or over double the rate of TV, and the near absence of heavy attack ads, only 5%, refutes the hypothesis that negative messaging in traditional political advertising is moving to the Internet. The data in this study was also in stark contrast to the messaging witnessed on campaign Web sites in the 2000 and 2004 elections by Latimer and Trela (2004). Whether these results are an anomaly or a broader trend in advertising on the Internet remains to be seen, but the small number of negative ads identified in the Internet sample was significantly less than any other political advertising study reviewed for this research.

While previous research in the field had looked specifically at negativity in political ads, very few had assessed the accountability and accuracy of campaign advertising or looked at how content gatekeepers at TV stations and Internet companies approve ads for air. Therefore the data collected here will provide new avenues for future research to test the results and assess how

accountability and accuracy change in Internet advertising in future election cycles. Finally, given the new phenomenon of YouTube and Internet political advertising in general, this was one of the first studies to specifically look at the content in Internet political ads and compare it to traditional advertising. The stark difference in accountability, which was deemed directly related to differences in regulation, will assist scholars in better understanding how the Internet is changing political communication. And, most importantly, the results will inform policy makers as they address federal regulations related to political advertising and oversight of the Internet.

6.2 Public Policy Implications

Two specific findings of this study have important policy implications. First, the lack of accountability in the Internet ads, based on the content analysis and the gatekeeper interviews, was directly related to differences in current federal laws. The main reason identified for this anomaly was a loophole in federal regulations related to political advertising on the Internet. In 2006, the Federal Elections Commission amended its rules related to political advertising (Code of Federal Regulations, Section 11 Parts 100, 110 and 114) to include advertising on the Internet in its definition of “public communications.” However, advertising was defined by the FEC as communication in which a payment is required (Federal Register Vol. 71, No. 70). This definition excluded ads placed on advertiser-supported sites such as You Tube, where a person or organization can upload videos for no charge. At the time, this decision was supported by numerous watchdog groups because it allowed for unregulated citizen political activity on the Internet through Blogs, chat rooms and message boards and limited Internet political communication to paid efforts by campaigns, political parties and activist groups such as unions.

(Campaign Legal Center, 2005) However, the introduction of YouTube in November of 2005 and the explosion of video sharing technology in general has changed the environment and now allows campaigns to produce mass market Internet advertising for free that is not subject to federal regulations. While the FEC has held hearings on this issue they have so far not modified current rules to close the YouTube loophole, in part because of continued pressure from citizen groups to not regulate citizen Internet political activity, including the use of YouTube. However, given the substantial use of YouTube during the 2008 election and the current development of similar sites, both by Microsoft and Hulu.com, the FEC's current definition no longer represents the business model for political advertising on the Internet. Further policy discussions surrounding political advertising will need to address this loophole to bring the same accountability requirements to unpaid Internet advertising that is currently required for television ads and paid Internet advertising.

Secondly, the stark contrast in how TV companies and Internet companies review political ads can be linked in part to the lack of specific federal oversight for Internet communication, because the FCC does not regulate the Internet. The TV gatekeepers noted that they were required to follow a strict approval process related to political advertising because of the oversight of the FCC. The FCC requires TV stations verify the entity paying for a political advertisement and that each ad feature an icon indicating who is paying for the advertisement. The FCC also maintains the federal licensing system for television stations, which gives them direct oversight over actions taken by those stations. In response, the gatekeepers interviewed indicated a complex review and approval system had been set up through their corporate offices and applied to all local stations to prevent instances of noncompliance.

The Internet gatekeepers followed a substantially reduced approval process, which was completely driven internally, with no external government review. The gatekeepers also noted that they were not required, either by their corporate offices or by any federal entity, to review ads to ensure compliance with federal laws. In Internet communication, all compliance issues are controlled by the Federal Election Commission, which has little jurisdiction over Internet companies and focuses its regulatory efforts on campaigns. This system means that even when ads are placed for a fee on a Internet site, and therefore are required to follow federal laws, the internal and government oversight and review of these ads is considerably less than in TV political advertising. Given this, there is the potential that content that can not be run on TV will get out on the Internet, even if the above mentioned loop hole is closed.

6.3 Policy Recommendations

The most important recommendation to come out of this study is the need to close the loophole in FEC rules that allows unpaid advertising to skirt federal content requirements for political advertising. Given the new business models present on the Internet, the current definition of campaign advertising as paid political communication no longer meets reality. To address the use of advertiser supported sites such as YouTube in which ads can be uploaded for free; FEC rules need to be amended to include any political communications produced by a campaign, regardless of how those communications are disseminated. The significant and successful use of YouTube by candidates in the 2008 presidential election illustrates a trend that will expand in future election cycles. Therefore, addressing the FEC loophole should be a top

priority for policy makers in 2009. In particular, bipartisan legislation now moving through Congress that would enact needed reforms to Internet advertising should be passed into law. The bill would require political campaigns, parties and activist groups such as unions to take credit for all Internet communication they produce but would not impact citizen activism on the Internet. (Scherer, 2007)

Secondly, the stark differences in regulatory framework between Internet political advertising and TV advertising needs to be examined and addressed. The lack of an FCC style body to regulate Internet companies will continue to hamper oversight of Internet political communication, even if the current FEC loophole is closed. Policy makers should review this issue as part of the broader discussions currently taking place over the regulation of the Internet as a whole. Any ultimate legislative package in this area needs to provide stronger oversight of Internet political advertising, particularly as it becomes a larger share of political advertising in future election cycles. One avenue for better oversight may be the incorporation of Internet user communities, as used by YouTube to regulate content, to assist in enforcing government regulations. This strategy would utilize the best aspects of the Internet's social networking assets, provide the government with significant assistance in regulating content and mollify Internet advocates who fear government regulation of the Web.

Finally, future research should be undertaken to determine whether or not Internet political advertising, regardless of what site it is presented on, is substantially different than TV advertising. This will help better inform policymakers on possible changes related to the regulation of the Internet and enhance understanding of how Internet political advertising is changing political communication.

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