



An Ascertainment Handbook For Public Broadcasting Facilities

corporation for public broadcasting

AN ASCERTAINMENT HANDBOOK
FOR PUBLIC BROADCASTING FACILITIES

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Office of Communication Research
Corporation for Public Broadcasting

FOREWORD

This publication, An Ascertainment Handbook for Public Broadcasting Facilities, has been prepared by the Office of Communication Research at the Corporation for Public Broadcasting to assist public broadcasters meet the requirements set by the Federal Communications Commission for ascertainment of community problems and needs. It provides step-by-step guidance for this process. The publication is in handbook form so that it can be updated as necessary. Appendix Three contains the FCC Report and Order.

Henry Loomis,
President, Corporation
for Public Broadcasting

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INTRODUCTION

This handbook has been prepared in response to the many requests for advice and counsel we have received regarding ascertainment procedures. Research done at Michigan State University, under a grant from CPB, provided the largest information source on different ascertainment procedures for public broadcasting stations. The handbook is issued in loose-leaf form that will enable it to be modified as the rules change or as additional methods of ascertainment are developed by various stations in the system.

Ascertainment is now a legal requirement for most non-commercial broadcasting stations. (Exceptions are noted in the handbook.) This handbook of necessity deals with the legal requirements for all stations; those specific to a given station must be dealt with by that station's own communication attorney; they cannot be answered here.

This handbook endeavors first to furnish information and advice on how to perform ascertainment studies in conformance with the Federal Communications Commission regulations. The specific requirements of the FCC are clearly pointed out in each section of the handbook. The Report and Order containing these rules is appended; it sets the minimum requirements.

The handbook also makes suggestions going beyond the legal requirements to enable stations to obtain more in-depth information about community needs, wants, and interests. We have attempted here to provide a pragmatic compromise between the rigors of methodological purity and the limited resources of a public broadcasting station. There

is no requirement by either the FCC or CPB to follow to the letter these extra suggestions.

We expect the handbook to be updated and modified to reflect feedback we receive from the stations. We ask that you share with us your reactions, thoughts, and endeavors with respect to ascertainment. We will disseminate any information we receive that could be of value to the stations in the system.

The Office of Communication Research has already initiated several studies in different areas of ascertainment. Some of the experimental studies already in progress are in the area of Latino ascertainment (which has its special problems); the differences of community problem perception between urban and non-urban community leaders; alternative methods for locating community leaders in ethnic communities; procedures for conducting a statewide ascertainment study which would follow the FCC ruling that all stations capable of program production are required to ascertain within the state network; methods for sampling the general public in sparsely populated areas; and models for developing continuing ascertainment within a community. One of the studies will produce a training video cassette which will indicate how best to train volunteers to carry out ascertainment studies.

The Office of Communication Research at CPB is available for consultation and advice as well as answering any questions that stations might have with respect to the handbook and its uses.

SECTION I

SCOPE, ORGANIZATION, AND DEMOGRAPHICS

Scope

On March 11, 1976, the Federal Communications Commission adopted a Report and Order¹ which requires that noncommercial educational and public broadcast applicants ascertain the problems, needs, and interests of their communities. Appendix Three contains the Report and Order.

The final rules adopted for noncommercial broadcasters are less stringent than those in effect for commercial applicants. For instance, while public radio applicants must ascertain their communities' needs and problems, they are not required to follow formal procedures, and they can submit to the Commission, at appropriate times, a narrative statement of how they accomplished the ascertainment. (See Section VI below for details about the radio-only requirements.)

Public television applicants, on the other hand, are required to carry out "formal" ascertainment surveys. The only major difference between their requirements and those of commercial applicants is that public television applicants are allowed to use alternative and less formal methods for conducting their general public surveys.

The Commission's adoption of ascertainment procedures for public broadcast applicants was premised on the fact that noncommercial educational broadcast stations have evolved from their original "in-school instruction"

¹Report and Order, "Ascertainment of Community Problems by Noncommercial Educational Broadcast Applicants, Permittees, and Licensees," Federal Register, Vol. 41, No. 59, March 25, 1976.

purpose to broader and more generalized programming that serves the public at large. To serve this larger purpose, public stations must be aware of the needs and problems of their communities in order to offer appropriate and responsive programming. The Commission specifically exempted stations that provide exclusive in-school services from ascertainment procedures. These exemptions also include low-power (10-watt) stations and translator stations.

The traditional basis of the Commission's allocation and licensing policies is the local service provided by stations. While the Commission is aware that both state educational networks and other generalized programming networks have evolved among educational and public stations, it nonetheless considers local service to be the cornerstone of a station's obligations. It has therefore required that ascertainment must be accomplished on a local level for each station that has the capability to originate programming. This means that every licensed station in a state or regional "network" is required to ascertain the needs and problems of its local community of license. State networks may, of course, carry out state-wide ascertainment, but such an effort can only be in addition to the local community ascertainment. In this manner, the Commission assumes that local stations will provide feedback to the central programming source, which will permit the network to create programming that addresses the problems of each individual locality. Obviously, any single program aired on the network can serve the needs of several local communities. But the concern is that the central programming source be made aware of local problems so that it can provide programming that meets pressing needs of particular localities.

Organization of Handbook

This handbook outlines step-by-step procedures for ascertainment of community problems, needs, and interests. First, it deals with ascertaining the needs, interests, and problems of community leaders. In particular, it describes a technique for identifying and then interviewing these leaders. Second, it specifies an approach for conducting a relatively simple public survey that will enable the station to obtain important information about its citizens' perceptions of their problems, needs, and interests. Finally, it suggests how public stations can use this information in their decision-making process. The handbook does all this in a step-by-step fashion, minimizing technical information and facilitating the efficient conduct of such studies.

Basically, the ascertainment procedures outlined in this handbook can inform the station as to the priorities of local leaders and the public with regard to local and non-local problems -- what problems they judge to be most important and which least important. On the basis of this process, the station can make programming decisions that will both inform people in the community about new problem areas and maintain their level of information about continuing problems.

Demographic Profile

The initial step in the ascertainment process is the compilation of demographic information on all elements of the community. It should include the numbers and proportions of males and females, minorities, youths (people 17 years of age and under), and older persons (those 65 years of age and over). The station must place this information in its public file and update it prior to each subsequent ascertainment effort.

This type of information is generally available from such sources as the U.S. Census Bureau, the local Chamber of Commerce, Bureau of Statistics, and other city offices.

Although a more detailed study is not required by the Commission, the station may wish to make a more complete study of the community, including the nature of industry and business, school populations, church listings, historical background, social attributes, and the like. This type of information can be useful in selecting the most representative leaders of the community.

SECTION II

COMMUNITY LEADER SURVEY

The objective of the community leader survey is to obtain perceptions of community problems and needs from a full range of leaders representative of all significant groups and interests in the community and, to a lesser degree, leaders in outlying communities within the station's service area (Grade B for television, 1 mV/m contour for FM, and 0.5 mV/m for AM). Community leaders may be able to identify community needs and problems not otherwise known to the broadcast station staff; this information can be of value in program planning and development.

A number of benefits can come from community leader ascertainment. A significant benefit will be a comprehensive list of local leadership resources for the station. Second, since leader interviews must be continuous throughout the license period, they furnish continuing information about the dimensions of community problems and interests. Matching this information against the problem priorities obtained from the public will provide a more complete and detailed picture of the community.

Covering the Community Elements

The Commission's Report and Order contains a listing of 19 groups and interests common to most communities. Interviews with leaders in all of the listed elements will establish "... the requisite coverage of significant community groups."²

²"Ascertainment of Community Problems by Broadcast Renewal Applicants - Primer," Federal Register, Vol. 41, No. 4, January 7, 1976, Appendix B, p. 1381.

Most community organizations can be categorized under one of the 19 main elements on the Commission's checklist, but, as noted, there may be elements in any given community that cannot. Such elements should be included under "Other," and leaders of these elements should be selected to be interviewed. For example, a community might have a very strong home-owners' association set up to combat property tax increases. In the station's review of the community, it may decide that this group deserves a separate voice -- especially if high taxes are considered a major problem in the community. This group may not fit into the 19 main categories and thus should be added under "Other."

A community may not contain one or more of the Commission's elements -- for example, there may be no military representation in the community. If this is the case, merely note on the form that this element is not present in the community. No element on the FCC checklist can be ignored, however, without comment.

The next page contains the Commission's Community Leader Checklist. Some representative examples of groups, organizations, and individuals are given in Appendix One.

A station may wish to reach leaders representing the interests of less articulate or less organized groups in the community. These groups and their leaders often get less media attention and exposure. Because there is no simple way to reach these people, some extra effort will be necessary should a station choose to seek them out.³

³Orville C. Walker, Jr., and William Rudelius, "Ascertaining Programming Needs of 'Voiceless' Community Groups," Journal of Broadcasting, Winter, 1976, p. 89. Copies may be obtained from the Office of Communication Research at the Corporation for Public Broadcasting.

FCC COMMUNITY LEADER CHECKLIST-SAMPLE⁴

Institution/Element	Number	Not Applicable (Explain briefly)
<ol style="list-style-type: none"> 1. Agriculture 2. Business 3. Charities 4. Civic, Neighborhood and Fraternal Organizations 5. Consumer Services 6. Culture 7. Education 8. Environment 9. Government (local, county, state & federal) 10. Labor 11. Military 12. Minority and ethnic groups 13. Organizations of and for the Elderly 14. Organizations of and for Women 15. Organizations of and for Youth (including children) and Students. 16. Professions 17. Public Safety, Health and Welfare 18. Recreation 19. Religion 20. Other <p>While the following are not regarded as separate community elements for purposes of this survey, indicate the number of leaders interviewed in all elements above who are:</p> <ol style="list-style-type: none"> (a) Blacks (b) Hispanic, Spanish speaking or Spanish-surnamed Americans. (c) American Indians (d) Orientals (e) Women 		

⁴Report and Order, March 25, 1976, p. 12434.

Lists of Community Organizations

A listing of the organizations and groups in a community may be obtained in a variety of places. First, commercial stations in the community have been ascertaining the needs of the community for a number of years and have thus compiled their own listings of community organizations. Their renewal applications containing these listings are available. The local commercial stations may be cooperative both in helping public stations obtain this information and in formulating joint leader interview sessions. Commercial stations, like public stations, are permitted to interview leaders in joint sessions, following a format that is open and permits free exchanges of ideas. These sessions must allow each interviewer individually to ask questions of the leaders. These panels and joint interviews might be arranged conveniently for both public and commercial stations.

Other important sources of organizational listings are the Chamber of Commerce, the United Way offices, the mayor's office, and various city and county agencies.

While organizational lists may first be compiled by clerical staff, it is important for station management to check the lists carefully in order to make certain that the significant community organizations and interests are represented.

The next step is to identify the administrative head of each group or someone in the organization who has leadership responsibilities and is familiar with both the interests of the organization and the problems of the community in general. At this stage, of course, it is most important to determine problems perceived by each organization. Common community problems will be discerned later when management makes a broad overview of the community needs and problems perceived by all organizations surveyed.

Leaders Outside the Community of License

While interviews with local community leaders require primary emphasis, an applicant must interview some leaders in major communities outside the community of license, but within the pertinent service contour (Grade B for television, 1mV/m for FM, and 0.5 mV/m for AM). The purpose of these interviews is to make the station broadly aware of the problems and needs throughout the service area. However, if a major community within a given station's area is served by other existing stations, this fact may be noted, and no special ascertainment made. If other major communities in a station's service area do not have their own local broadcast service, interviews with one or two leaders who have a broad knowledge of the community's needs and problems are adequate. These interviews may be conducted by telephone.

Representing the Opinion of Community Elements

Leader interviews should produce a representative cross-section of opinion concerning community problems and needs. While one leader interview in every checklist category assures minimum coverage, this may or may not be representative of the community. Three additional issues should be dealt with by the concerned applicant.

First, the number of leaders interviewed within individual categories depends upon how significant that element is in the entire community. The licensee should exercise reasonable discretion in considering factors affecting significance such as size and influence of groups making up an element.

Second, the minimum number of leader interviews required of a non-commercial licensee has not been specified by the Commission. Instead, it has noted "reasonable" numbers of leader interviews to be conducted by commercial broad-

casters over their license term.⁵

Third, ascertainment is expected to be a continuing process. This means that leader interviews should be distributed over all three years of the license term rather than being completed over a shorter time span. Interviewing community leaders should be a continuing effort, not three separate and complete ascertainments. (The General Public Survey may be conducted at one particular time during the license period.)

Conducting the Leadership Interviews

Up to 50% of the leader contacts may be made by staff and volunteers. Management-level personnel (e.g., station managers, program directors, principals of the licensee corporation, etc.) must conduct at least 50% of the leader contacts. No volunteer in any position may be counted as management-level personnel; if a volunteer conducts an interview, it is counted as a volunteer interview.

⁵"Ascertainment by Broadcast Renewal Applicants - Primer," op. cit., p. 1382.

Suggested Number of Leader Interviews for Commercial Broadcasters

Population of City of License	Number of Consultations
10,001 to 25,000 -----	60
25,001 to 50,000 -----	100
50,001 to 200,000 -----	140
200,001 to 500,000 -----	180
Over 500,000 -----	220

We recommend this be considered as a very rough guide.

Leaders outside the community, but within the service area, may be contacted by telephone. Local leaders may also be interviewed by telephone. (See sample Introduction for such calls.) The Commission has set no definite limits on the use of telephone surveys for leaders. We recommend that this procedure be left for special circumstances, such as when the leader would be unavailable otherwise, or if the leader requests that the interviews be conducted by telephone. Leaders interviewed by telephone should receive a follow-up letter.

Other methods besides one-to-one interviews are permitted. Group meetings and panel discussions with leaders are acceptable for survey purposes as long as the leaders involved are permitted to express fully their opinions on needs and problems, and interviewers (whether from one station or several) are allowed freely to question the leaders to attain a complete understanding of these problems and needs. The Commission has emphasized that interview questions should be open-ended to prevent responses that are limited by the form of the inquiry.

Chance encounters with leaders are another acceptable form of interviewing. If station people meet a leader on the street and discuss local problems with him, that discussion may be used in the leadership survey.

Whenever and however leaders are interviewed, notes should be taken at the time, and stations may wish to follow up with letters that set down the crux of the discussions. In all cases, the leadership interview results must be recorded in some form and put in the station's public file within a reasonable time after the interviews, normally 45 days. A suggested "Leader Contact Form" follows on page 13.

SAMPLE INTRODUCTION

Hello, I am _____ of public broadcasting
(name and title)
station _____. As part of our responsibility to serve
the members of this community, we are attempting to identify the major
issues and problems that face our community. We are asking the help
of community leaders with special knowledge of needs and problems of
_____ to help us. I would like to talk to
(town)
you, as one of the leaders of the community, some time at your conven-
ience. Your comments and suggestions can then be reflected in the
programming decisions of the station.
Could we arrange a time for about 30 minutes to discuss community needs
and problems in your area of special interest?

(This sample should be adapted to a conversational style that is comfortable for the interviewer before calling to make an appointment.)

SUGGESTED LEADER CONTACT FORM⁶

Date: _____

Name, Position, and Address of Person Contacted:

Organization Represented by Person Contacted:

Date and Time of Contact: _____

Place of Contact: _____

Method of Contact: _____

Problems, Needs, and Interests Identified by Person Contacted:

Name of Interviewer: _____

Reviewed by: _____ Position: _____

Date: _____

⁶The Commission's suggested form is in the Report and Order, p. 12434, which may be found in Appendix Three.

Replacement of Leaders Not Interviewed

Once the original selection of leaders has been made, the station will want to maintain its representative balance. Substitutions should be made for leaders the station is unable to reach or interview. Replacements should be people from a leader category similar to the one from which the original unreachable leader was drawn. For example, if one elementary school principal fails to respond, it is best to select another elementary school principal. That way, important categories of leaders will not be underrepresented.

Record Keeping

The personal interview process for the community leader survey described above requires simple record keeping to avoid administrative problems and to prevent duplication of interviews. These procedures should generate a continuing survey of community leaders. The information obtained from these sources, and how it can be used, are explained below in Section VII on utilization.

SECTION III
ASCERTAINMENT QUESTIONNAIRE OF
THE COMMUNITY

This section offers a sample questionnaire for the ascertainment of the community. The questionnaire is based on studies commissioned by the Corporation for Public Broadcasting. It offers a useful starting point that can be modified to fit different local situations.

Essentially, the questionnaire is designed to pinpoint the problems and needs of the community, as perceived by citizens in a public canvass. It should elicit the public's judgments of the significance of various issues and how the public orders its priorities in terms of local needs and problems.

Open-Ended Question

We suggest that the initial portion of the general public interviews be an open-ended question asking respondents to describe problems they perceive in the community. The open-ended question allows for responses not suggested by the Master Problem List (MPL - to be described shortly) and should precede inquiries taken from the MPL. The open-ended question also serves to warm up the respondent. It should not be eliminated from the questionnaire. Furthermore, if open-ended responses in early interviews reveal problem areas not included in the MPL, the MPL should be appropriately modified for future interviews.

The Master Problem List (MPL)

The MPL is a potentially valuable management tool because it collects a "community snapshot" of a community's problems and needs. The MPL is able to furnish both the management and the programmer with data related to what is and what is not a problem in the community.

It should be clear that the Commission does not require that a station utilize a form such as the MPL. The MPL does have a number of advantages, the principal one being its standardization. Using a standard form allows one to compare findings between various survey periods (time one with time two) or to compare the findings between markets or cities. If everyone uses essentially the same basic form, then comparisons can generate "community profiles." Further, the categories on the list can serve a number of useful purposes during an ascertainment interview of a member of the general public. The list assures the station that no categories will be overlooked due to respondent memory failure or fatigue. Problems that are sporadically bothersome can be cued to recall by the MPL. Additionally, the MPL is a useful clerical device because a problem/need filing system can be conveniently built around MPL elements.

MASTER PROBLEM LIST (MPL)

1. City size, zoning, districting (over-populated or under-populated)
2. Community decay or renovation (beautification)
3. Consumer issues (protection, education, quality of goods, services)
4. Crime
 - 4a. Adult crime
 - 4b. Juvenile crime
 - 4c. Law enforcement (court leniency, police brutality, size of police force)
5. Ecological issues
 - 5a. Pollution
 - 5b. Energy crises, effects, solutions, scarcities
6. Government (local agencies, officials, credibility, leadership)
 - 6a. Politics, campaigns
7. Housing
8. Inflation
9. Labor unions, strikes
10. Legal and civil rights (awareness of them, access to legal aid or protection)
11. Leisure activities (indoor and outdoor, recreation, parks)
12. Mass media (availability, quality, content)
13. Medical care (hospitals, doctors)
14. Problems of minority groups
 - 14a. Racial or ethnic minorities
 - 14b. Sexist behavior
 - 14c. Sexual deviates
15. Morality issues (pornography, abortion)
16. Schools, formal educational institutions
 - 16a. Bussing, integration, desegregation
17. Senior citizen problems
18. Substance abuse (drugs, alcohol)
19. Taxes
20. Transportation problems
 - 20a. Public transportation (busses, mass transit, railroads)
 - 20b. Traffic problems (cars, roads, parking, drivers, bicycles)
21. Unemployment, job training
22. Welfare

Other possibilities

Agriculture (farms, farm products)
Campus-community problems

A full station staff meeting might be held to determine their ratings of problems to be assessed in the public survey. All staff members could be asked to order the full set of problems as they believe the public will order them. When the responses come in from the public, the station staff's expectations can be compared with the information actually obtained. This should point out both similarities with and discrepancies in the station personnel perceptions of needs and problems relative to those of the general public.

The manner in which the problem areas could be presented to the public in the questionnaire is presented on the following page. It should be noted that these questions are only one interpretation of the MPL categories and are not necessarily applied verbatim. Rather, each licensee should evaluate the MPL items, one-by-one, and alter those unsuited to local conditions.

PARTIAL EXAMPLE OF MPL QUESTION FORMAT

Now, I'm going to ask you about things that are problems in some communities and not in others. I'd like you to tell me whether these things are, or are not, problems in your community, in your opinion.

Is there a problem with pollution in the community?

_____ Yes _____ No

Is there a problem with public transportation in the community?

_____ Yes _____ No

Is there a problem with illegal drugs in the community?

_____ Yes _____ No

Is there a problem with housing?

_____ Yes _____ No

Is there a problem with crime?

_____ Yes _____ No

The same format should be used for all other issues, whether they derived from the MPL or originated at the station.

Experience has shown that respondents should be able to handle between 20 or 30 such issues without tiring. For respondents who answer "don't know," or "not sure," treat such answers as "no." ⁷

Basically, the way to treat this information is to tally the frequency of affirmative responses as a percentage of the total responses. Then, order the percentages from highest to lowest. This yields the public ranking for the set of problems.

This has been a description of the highlights of the questionnaire, but there are other parts, each of which plays an important function in gathering information from the public. All are incorporated into the sample questionnaire at the end of this section. The other parts are discussed below.

⁷ Ascertainment research is concerned with perceptions of whether an issue is a community problem. Responses of "do not know" or "no opinion" indicate that the individual does not perceive an issue to be a problem. These responses are coded as "no" answers although at a later date the "do not know/no opinion" group can be analyzed if there is an interest in, say, public indecisiveness about the issue.

The Bookkeeping Section

The first part of the questionnaire contains quality control information. This is the bookkeeping section and includes three parts.

EXAMPLE OF BOOKKEEPING SECTION OF QUESTIONNAIRE

Phone # <u>(517) 349-9379</u>	Interviewer: <u>John W. Smith</u>	
<u>Disposition of the Questionnaire</u>		
Completed	<u>Call 1</u>	<u>Call 2</u> <u>Call 3</u> 7 p.m. (6/17)
Busy	6 p.m. (6/16)	
No Answer		4 p.m. 6/17
Disconnected or Business Phone		
Foreign Language (State language)		
Refused		
Enter time and date in appropriate spaces.		

1. The Phone Number of the Respondent. After the questionnaire is reproduced, phone numbers from the random sample should be written at the top of the first page. (The selection of phone numbers is discussed on pages 32-37).

2. The Name of the Interviewer. Having the interviewer write his or her name on the questionnaire allows the staff to check out and correct ambiguities and errors.
3. The Disposition of the Questionnaire. To ensure the representativeness of the sample, every effort should be made to contact all the phone numbers selected. If the initial effort to contact the the respondent is unsuccessful, at least two more callbacks are recommended. The reason for lack of success should be recorded for each effort so that interviewers know where they stand on the next effort, or so that the particular questionnaire can be discarded as unusable. There are several reasons (or stages) for the disposition of the questionnaire:
 - a. Completion.
 - b. Busy number. Try again in half an hour.
 - c. No answer. Try again, a different day and a different time.
 - d. Disconnected or business phone. Record this and set questionnaire aside.
 - e. Foreign language. Record and set questionnaire aside for later callback by an interviewer who can speak the language.
 - f. Refusal. Politely ask if you can call back at a more convenient time. If the answer is still no, thank the respondent and hang up. Record and set questionnaire aside.

These bookkeeping components are condensed in the format on page 21.

Interviewer's Introduction

Respondents to an ascertainment questionnaire are contributing their time and effort; they deserve to know to whom they are talking and why. A concise explanation of the reasons for the survey should help gain their cooperation. The introduction should include the following:

1. The interviewer's name.
2. A brief explanation of the purpose of the survey.
3. A statement that the survey will take only a few minutes.

The introduction might read something like this:

INTRODUCTION

Hello, my name is _____. I'm calling for a
television station here in _____. We're trying to find
(town)
out what people who live here think are the major needs and problems
in the community.

It is a good idea to provide interviewers with the phone number of the person specifically designated to be in charge of the project. Respondents can be given that person's name and number if they want to have more information about the study. (By the way, it is important to notify all station personnel that the study is going on, and who is in charge.)

It is a good idea to start the questionnaire with one or two questions that put the respondents at ease and give them a chance to cite problems on their own before the MPL directs them to specific problem areas. Below are three examples of introductory questions:

INITIAL QUESTIONS

1. First of all, how long have you lived in this area?
_____ years _____ months
2. Overall, how satisfied are you with living in this area? Would you say:
_____ very satisfied _____ somewhat satisfied
_____ not very satisfied _____ not satisfied at all
3. What do you think are the most important problems or needs of the community? _____

Demographic Characteristics

Demographic questions help the interviewer find out information about the respondents. They are important for two reasons. First, the answers can be compared with census data for the signal area to check the representativeness of the completed sample. In most cases, the sample will probably not match the census perfectly, but at least the comparison shows if any group has been grossly undersampled. Second, certain subgroups of the population may perceive community needs differently than others. For example, the questions may show that the elderly have special needs that might be addressed by station programming.

Demographic questions may include the following:

1. Family composition. This is the number of people who live at the address and the number of children of different ages.
2. Education of the respondent
3. Age of the respondent
4. Race of the respondent
5. Sex of the respondent
6. Family income.

Respondents may be sensitive to some demographic questions, such as age and race. That is why they are not asked for such information until the closing part of the interview.

Station Audience Information

The basic questionnaire is not a long one; it can usually be completed within 10 minutes. Depending on the station's interests, it may wish to include some supplemental questions that are not necessarily related to ascertainment. Potential issues regarding audience perceptions of the station are:

- | | |
|-----------------------|-----------------------------|
| ... Station awareness | ... Frequency of viewing |
| ... Reception quality | ... Programming preferences |

These questions should be asked after community problems and needs have been discussed but before the demographic inquiry. The next page illustrates such questions.

STATION AUDIENCE INFORMATION

I'D LIKE TO ASK YOU A FEW QUESTIONS ABOUT LOCAL TELEVISION.

ON YOUR TV SET, CAN YOU RECEIVE ANY CHANNEL WHICH IS A "PUBLIC BROADCASTING" OR "EDUCATIONAL" CHANNEL?

_____yes _____I'm not sure _____no

(If yes, ask these questions.)

WHAT CHANNEL IS THAT?

_____gives correct number/call letters _____incorrect

IN THE LAST WEEK, HAVE YOU PERSONALLY SEEN ANY SHOWS ON THAT CHANNEL?

_____yes _____I'm not sure _____no

WHAT SHOW WAS THAT? _____

IN THE LAST WEEK, HAS ANYONE IN YOUR FAMILY SEEN ANY SHOWS ON THAT CHANNEL? (If yes:) WHO?

(Check all that apply)

Children _____yes _____no

Spouse _____yes _____no

Others _____yes _____no

GENERALLY, HOW GOOD OR HOW BAD A PICTURE DO YOU GET ON THAT CHANNEL? WOULD YOU SAY:

_____good _____fair _____poor

ARE THERE ANY KINDS OF SHOWS YOU WISH THIS CHANNEL WOULD HAVE MORE OF? (List) (Probe) ANYTHING ELSE?

Sample Questionnaire

A fully developed questionnaire appears next in this handbook. Processing the data is described on pages 44-47.

CPB ASCERTAINMENT QUESTIONNAIRE

Phone # _____

Interviewer: _____

Call 1

Call 2

Call 3

Completed

Busy

No Answer

Disconnected or
Business phone

Foreign language
(State Language)

Refused

HELLO, MY NAME IS _____. I'M CALLING FOR A LOCAL
TELEVISION STATION HERE IN _____. WE'RE TRYING
TO FIND OUT WHAT PEOPLE WHO LIVE HERE THINK ARE THE MAJOR NEEDS
AND PROBLEMS OF THE COMMUNITY.

ARE YOU THE HEAD OF THE HOUSEHOLD?

(If yes, continue the interview. If no, ask to speak to the head
of the household. If head is not available, interview the person
answering the phone if he or she is over 16 and a member of the
family. No babysitters!)

(If the respondent wants to talk to someone in charge, have them
call _____ at _____.)

1. FIRST OF ALL, HOW LONG HAVE YOU LIVED IN THIS COMMUNITY? _____
2. OVERALL, HOW SATISFIED ARE YOU WITH LIVING IN THIS COMMUNITY? WOULD YOU SAY:
_____ very satisfied _____ somewhat satisfied
_____ not very satisfied _____ not satisfied at all
3. WHAT DO YOU THINK ARE THE MOST IMPORTANT PROBLEMS NOW FACING THIS COMMUNITY?
(Probe:) ANY OTHERS?

NOW I'D LIKE TO REVIEW SOME POTENTIAL PROBLEM AREAS AND ASK IF YOU CONSIDER THEM TO BE PROBLEMS IN THE COMMUNITY?

- | | | |
|--|----------|---------|
| 4. IS THERE A PROBLEM WITH PUBLIC TRANSPORTATION IN THE COMMUNITY? | _____yes | _____no |
| 5. IS THERE A PROBLEM WITH POLLUTION IN THE COMMUNITY? | _____yes | _____no |
| 6. IS THERE A PROBLEM WITH ILLEGAL DRUGS? | _____yes | _____no |
| 7. IS THERE A PROBLEM WITH HOUSING? | _____yes | _____no |
| 8. IS THERE A PROBLEM WITH CRIME? | _____yes | _____no |
| 9. IS THERE A PROBLEM WITH MEDICAL SERVICES IN THE COMMUNITY? | _____yes | _____no |
| 10. IS THERE A SENIOR CITIZENS' PROBLEM? | _____yes | _____no |
| 11. ARE THERE PROBLEMS WITH LOCAL TAXES? | _____yes | _____no |
| 12. ARE THERE WELFARE PROBLEMS? | _____yes | _____no |
| 13. ARE THERE MINORITY GROUP PROBLEMS? | _____yes | _____no |
| 14. ARE LABOR RELATIONS A PROBLEM? | _____yes | _____no |
| 15. ARE THERE UNEMPLOYMENT PROBLEMS? | _____yes | _____no |
| 16. IS THERE AN ENERGY PROBLEM? | _____yes | _____no |
| 17. IS THERE A POPULATION PROBLEM? | _____yes | _____no |
| 18. ARE THERE PROBLEMS WITH THE LOCAL SCHOOLS? | _____yes | _____no |
| 19. ARE THERE TRAFFIC OR PARKING PROBLEMS? | _____yes | _____no |
| 20. IS THERE AN INFLATION PROBLEM? | _____yes | _____no |
| 21. IS THERE A PROBLEM WITH PARKS OR RECREATIONAL FACILITIES? | _____yes | _____no |
| 22. IS THERE A PROBLEM WITH POLICE OR FIRE PROTECTION? | _____yes | _____no |
| 23. IS THERE A PROBLEM WITH STREET AND HIGHWAY MAINTENANCE? | _____yes | _____no |
| 24. IS THERE A PROBLEM WITH OBSCENITY IN THE MEDIA? | _____yes | _____no |
| 25. IS THERE A PROBLEM WITH GAS, ELECTRIC, AND UTILITY SERVICES? | _____yes | _____no |

* * * OPTIONAL QUESTIONS * * *

NOW I'D LIKE TO ASK YOU A FEW QUESTIONS ABOUT LOCAL TELEVISION.

26. ON YOUR TV SET, CAN YOU RECEIVE ANY CHANNEL WHICH IS A "PUBLIC BROADCASTING" OR "EDUCATIONAL" CHANNEL?

_____yes _____I'm not sure _____no

(If yes, ask these questions.)

27. WHAT CHANNEL IS THAT?

_____Gives correct number/call letters _____incorrect

28. IN THE LAST WEEK, HAVE YOU SEEN ANY SHOWS ON THAT CHANNEL?

_____yes _____I'm not sure _____no

29. WHAT SHOW WAS THAT? _____

30. IN THE LAST WEEK, HAS ANYONE IN YOUR FAMILY SEEN ANY SHOWS ON THAT CHANNEL? (If yes:) WHO?

(Check all that apply)

Children _____yes _____no

Spouse _____yes _____no

Others _____yes _____no

31. GENERALLY, HOW GOOD OR HOW BAD A PICTURE DO YOU GET ON THAT CHANNEL? WOULD YOU SAY:

_____good _____fair _____poor

32. ARE THERE ANY KINDS OF SHOWS YOU WISH THIS CHANNEL WOULD HAVE MORE OF?
(List) (Probe) ANYTHING ELSE?

NOW, JUST A FEW FINAL QUESTIONS.

33. HOW MANY PEOPLE LIVE IN THIS HOUSEHOLD? _____

34. ARE THERE ANY PRE-SCHOOL CHILDREN IN THE HOME? _____yes _____no

35. ARE THERE ANY ELEMENTARY SCHOOL CHILDREN IN THE HOME? _____yes _____no

36. ARE THERE ANY TEENAGERS IN THE HOME? _____yes _____no

37. HOW FAR DID YOU GO IN SCHOOL?

_____less than high school
_____high school
_____some college
_____college degree
_____refused

38. HOW OLD ARE YOU?

_____under 18 years
_____18-25 years
_____26-35 years
_____36-50 years
_____51-65 years
_____over 65 years
_____refused

39. WHAT IS YOUR RACE?

_____white
_____black
_____Asian
_____American Indian
_____Hispanic
_____other
_____refused

40. WOULD YOU PLEASE TELL ME WHICH OF THESE CATEGORIES REPRESENTS THE TOTAL FAMILY INCOME?

_____under \$10,000
_____ \$10,000 to \$15,000
_____ \$15,000 to \$20,000
_____more than \$20,000
_____refused

41. MAY I HAVE YOUR NAME? _____

_____refused

42. INTERVIEWER SHOULD RECORD SEX OF RESPONDENT.

_____male _____female

THANK YOU VERY MUCH FOR HELPING US!

Creating a Sample for the Ascertainment of the Public

This section will set up a step-by-step procedure for drawing a sample that is as representative as can be expected of the public. Two different sample selection techniques will be demonstrated.

The purpose of sampling is to provide representative estimates of community opinions and attitudes. It is assumed that the community consists of at least several thousand people, and that sampling is an efficient means to characterize community needs. Of course, if a station happens to be broadcasting to a community of only 300 to 400 people, the station might forego sampling and interview everyone.

Sample Size - Type 1: Total Community

This sample procedure assumes that the station is interested only in obtaining a broad representation of opinion, without regard to further subdivision of the data by sex, age, race, or other characteristics.

To choose the proper sample size is not a difficult chore, but may be often a perplexing issue for the beginning "surveyor." Consider the following matrix:

<u>Number of Demographic Control Variables</u>	<u>SELECTING A SAMPLE SIZE</u>	
	<u>City Size</u>	
	<u>Under 100,000 Homes</u>	<u>Over 100,000 Homes</u>
"Zero"	200	350
One	300	450
Two	400	525
Three or More	500	600

Actually the size of city has less to do with sample size than does the number of variables one is considering studying in the project. Let us assume you do not want to study any variables such as the sex of respondent, race or level of education but rather just want overall opinion about life in city "X." In that case use the zero category line giving a sample size of 200 for the under 100,000 city size and 350 for cities over 100,000 homes. Otherwise, for every variable included, between 75-100 respondents should be added to the sample. Thus the minimum sample size should be 200 respondents and between 500 and 600 should be adequate for studies which will analyze results by various demographic or socio-economic characteristics.

Sampling (the act of picking respondents) and sample size are often complicated by unique problems associated with various communities. If you have the slightest doubt about sample size or your sample selection method, feel free to contact a local expert or call the Office of Communication Research at the Corporation for Public Broadcasting.

The sample can be efficiently created using the phone directories serving the community. In most cases, these provide the most complete and available listing (referred to as a sampling frame) that can be managed within a station's limited monetary resources. Ideally the general public sampling frame should include all homes within the community of license, and it is from these areas that the sample must be drawn.

The completeness of phone saturation and listings varies from community to community. In major cities, large segments of the population, some say up to 20%, have unlisted numbers. In other areas, such as university communities, the telephone directories probably do not contain student phone listings. In such instances, a university telephone directory should be added to the sampling frame.

The method of drawing a sample from the telephone directories is described below. The entire set of directories is treated as a single sampling frame. The steps are as follows:

1. Find how many total pages of residential listings (usually the white pages) there are in the directory or set of directories. (Example: 500 pages)
2. Multiply the number of pages by the number of columns per page. (Example: 500 pages x 4 columns = 2,000 columns)
3. Divide the total number of columns by the desired sample size. (Example: Desired sample size is 200, so 2,000/200 = 10). The result (10) is called the skip interval. This tells you that if you select one number in every 10th column, you will end up with 200 numbers in one pass through the directory.
4. Now, write the numbers 1 through 10 on separate slips of paper and put them in a hat. Draw one out. What is it? Let's say it's 6. That means you will draw your first number from column 6, skip to column 16 for your second number, skip to column 26 for your third number ... and obtain your 200th number from column 1,996. Of course, the numbers you actually put in the hat to begin with will include the number 1, and all the numbers up to the size of the skip interval you determined by division in step 3. Here's a summary of the sampling formula thus far:

$$(1) \frac{\text{\# of pages of listings}}{\text{\# of columns/page}} \times \text{\# of columns/page} = \text{total \# of columns}$$

$$(2) \frac{\text{Total \# of columns}}{\text{sample size}} = \text{skip interval}$$

5. Now all you need to decide is which number in the column to pick. If the directory is for your community only, count the number of names in each column. (Example: 50) Put the numbers 1 through 50 in a hat and select one. Let's say 23. Your sample will include the 23rd number down in each selected column.

6. If the name so identified is for business or government agency listings, continue forward one skip interval (e.g., with a skip interval of ten and a non-residential number in column 16, you would draw a listing from column 26).
7. It's possible that you could go all through this process and end up a few numbers short of 200. If that happens, pick a new column number (see step 4 above), go back to the start of the book, and supplement the list you have with new numbers.
8. When you're through, you will have created a random sample of telephone numbers that should give you an adequate representation of community opinion. Why all this fuss and bother in creating a list of phone numbers? Why not go through the phone book, picking a cluster here and a cluster there? The reason is that the procedure outlined here removes many kinds of biases. For example, some alphabetical sections contain clusters of a given ethnic group. With the procedure outlined above, everyone initially has a known chance of being a respondent in your survey. And that is what representativeness is all about -- making sure that all people have an equal chance of being selected to express their opinions.

All of the above survey information has been premised on an ideal situation, e.g., obtaining exactly the 200 interviews specified from the 200 telephone numbers selected in the sample-making process. But from experience it is known that only about 2/3 of a telephone sample is usable. That is, for every 100 telephone numbers selected, about 65 to 70 yield complete interviews. The remainder of the numbers represent people never at home after three telephone attempts, disconnected numbers, business numbers, and respondents who refuse to cooperate.

It is suggested that you anticipate these limitations by over-drawing the initial sample. That is, draw more than 200 numbers in order to end up with a full 200 interviews.

Using the assumed completion rate of 2/3, the sample to be initially constructed in order to end up with 200 completed interviews should include 300 phone numbers. If you decide to use 300 for your sample, rework the previous computations for sample selection using that figure.

Sample Size - Type 2: Sub-group Analysis

The foregoing sample was used to create a survey representative of the entire community at one time. For that purpose, a relatively small sample is adequate. Now, let's say that you are particularly interested in how different segments of the community define as community needs, that you want comparisons among racial groups, age groups, rural and urban residents, and so on. (This type of analysis is not required for the Commission's ascertainment obligations. If you need this in-depth information for your own purposes, then by all means pursue this type of sample. Otherwise, you may proceed to process and analyze your original sample.)

If this more detailed information is to be obtained, then your original sample will have to be constructed somewhat differently. You will want to end up with 75-100 people in any given sub-group type. Let's say that you want to compare the responses of white people with those of black people. Say that you know, for example, that the black community makes up 10% of the entire community. From your original sample of 200, you would end up with 20 respondents who are black. That is too small a number for estimating the views of blacks. You need about 75 to 100 people in any such sub-group for purposes of minimum precision.

One option is to determine if a city directory is available in the community that gives a listing of addresses. You could then identify key areas in the community of license that are predominantly black, and draw a random supplemental sample of 75 residences from that area. Information from these 75 black households could be compared with your overall community sample of 200, or community needs of whites and blacks could be compared.

If you are going to this additional effort, you probably are

interested in other comparisons, for example among age groups or educational levels. The minimum number of interviews recommended for sub-group comparisons within a community can be found on page 32.

A sample of this size yields a good deal of quantitative information. But you should be warned that it is too large a sample to work with unless there is access to data processing equipment. See pages 44-47 below.

SECTION IV

CONDUCTING THE GENERAL PUBLIC SURVEY: INTERVIEWER PROCEDURES AND DATA PROCESSING

Once you have a questionnaire and a sample, you can begin the field work. Interviewers must be recruited, trained, and supervised. This section discusses methods and potential problems involved in selecting, instructing, and monitoring interviewers during the field-work stage of the study. Management-level personnel must maintain close supervision over the conduct of the general public survey and the interviewers -- whether they are volunteers or paid employee interviewers.⁸

Interviewer Selection

An interviewer should be able to complete at least two interviews per hour. The 200 interview example would therefore require approximately 100 person-hours for completion. To determine how many interviewers will be necessary the licensee must first decide how many days will be allotted to field work (e.g., five). That number, multiplied by seven hours per day per interviewer (i.e., $5 \times 7 = 35$), provides a product that is then divided into total person-hours (i.e., $\frac{100}{5 \times 7} = 2.86$) to give you the number of interviewers you will need for each day of field work. Three interviewers could finish the job in roughly five days.

⁸The exception to this rule is when a professional opinion polling firm conducts the entire general public survey.

The entire formula is discussed below:

$$\text{Number of interviewers} = \frac{\frac{\text{total number of interviews}}{2 \text{ interviews per hour}}}{\text{Days of field work} \times 7 \text{ hours per day}}$$

The group of interviewers should include both men and women. Men and women respondents may answer differently to interviewers of the same or the opposite sex. The way to guard against this bias is to use both men and women as interviewers.

A major decision in interviewer selection centers on the use of volunteers or "friends of the station" versus paid interviewers. The choice of volunteer or paid interviewers has implications for the time, cost, and management control of the public survey.

Unfortunately, the quality and cost distinctions between the two groups of interviewers do not neatly suggest which group is preferable. Volunteer interviewers are less costly. Paid interviewers, however, tend to be more efficient in terms of total study time and supervisory requirements primarily because they have had some prior experience. With proper training there is no reason why volunteers should not be equally efficient.

The use of volunteers should be carefully considered. Will they do the work well, under supervision, and within a reasonable time frame? Will they undertake the task **knowing** full well that it may become somewhat tedious before they have completed their assignments? Will they find it sufficiently rewarding?

With paid workers, supervision of interviewers is less of a problem. There is less hesitancy for the supervisor to require necessary training sessions, impose standardized interviewing techniques, and require weekend interviewing.

Interviewer Training

The major concern is uniformity among all interviewers. Each question should be asked in the same way of each respondent. Any changes in question format or phrasing may bias the responses and make them less comparable. Interviewers should be instructed to read each question as it appears on the questionnaire.

The training session should include dry runs through the questionnaire. At that time, the trainer can go step by step and item by item through the questionnaire asking for questions and advising interviewers concerning anticipated difficulties. Interviewers should read through the questionnaire aloud two or three times, and then they should pair off with each other for practice sessions. Further, it would be useful to have two or three extra phone numbers per interviewer. Let those two or three be the first calls made, so that they can be discarded. By this time, the interviewer should be sufficiently practiced and rehearsed to encounter only minor problems.

After reading the introductory remarks explaining the study, interviewers should continue directly into the first question. This increases the probability that the respondent will cooperate with the interviewer.

After the introduction, the respondent may have additional questions about the study. Interviewers should attempt to deal with these as fully as possible without biasing responses to specific interview questions. It is also possible that despite assurances of the good intentions of the study, the respondent may refuse to participate. No attempt should be made to argue if someone does not wish to answer a specific question or respond to the entire interview.

In answering questions about community problems, there will be great differences in people's facility in responding. The interviewer should allow adequate time for responses and possibly repeat the question for those who are hesitant.

In the preparation of this handbook, the Corporation for Public Broadcasting has funded a project to produce an interviewer training video-tape. Such a tape will provide much of the training information needed, and in better form than can be done here in writing. The training tape could supplement any in-house training by the station. Copies will be available at cost upon completion of the project.

Interviewer Supervision

Supervision of a team of interviewers is potentially the most time-consuming task in the public survey. Several management strategies can greatly reduce the time necessary to complete the field work.

The most beneficial management-control technique is to gather all of the interviewers at a single location. If four to eight interviewers are recruited, it is easy to monitor their work from 7:00 p.m. to 10:00 p.m. at the same location on consecutive nights. Single-location monitoring requires a bank of telephones with as many separate telephone lines as there are interviewers. People should not make interviews from their own home. Each interviewer should be given a list of telephone numbers he or she is to call. Interviewers should receive the same number of questionnaires and phone numbers. They should immediately place one phone number in the appropriate location on each questionnaire. In this manner,

the disposition of each phone number is known -- whether it is completed, busy, disconnected, etc. The disposition is then indicated in the bookkeeping section of the questionnaire.

Interviewers should determine who is appropriate to question at each residence. Persons who appear to be unable to respond to questions, for example, small children, should not be interviewed. If a child answers the phone, the interviewer should ask to speak to the head of the household.

You should know if there is a substantial foreign-language group in your community (10% or more). If so, one or two interviewers should be selected who are conversant in that language, and they should receive phone numbers of households identified as foreign-language households. It will probably not be possible to identify these homes until an initial contact has been made, perhaps by another interviewer. In those instances, merely compile a listing of foreign-language households and refer them to a bilingual interviewer.

A field supervisor must be appointed because it is imperative to have clear identification of where field control resides. That person may or may not be the overall study director. The field supervisor should monitor two or three interviews by each interviewer. This person then has a chance to advise interviewers about problems they have in conducting the interviews. It is also an opportunity to ensure that questionnaires are being completed properly.

Processing and Interpreting the Results

When the field work is done, and you have the questionnaires in your office, what's the best way to process the information? We'll offer two solutions -- one for those who intend to hand-tabulate the results, and the other for those who have computer facilities available.

Hand Tabulation

When the hand tabulation is the likely mode of analysis, we estimate that it will take three people working full-time for two to three days to process the data from 200 completed short questionnaires. The sample questionnaire has four pages of data in it. Assign each person to handle a single page, and to tally all results from all respondents for that page of questions.

Create a worksheet for each page of questions, so that the tally can be a set of check marks for each question, next to each response category. When a full set of check marks has been made, add them up. Then convert the frequencies for each question to a percentage distribution. An example is shown on the next page.

TABULATION OF RESPONSES: AN EXAMPLE

<u>Education</u>	<u>Frequency</u>	<u>%</u>
Less than high school <u> </u>	20	10.0
High school <u> </u> <u> </u>	65	32.5
Some college <u> </u> <u> </u>	50	25.0
College Degree <u> </u> <u> </u>	50	25.0
Refused <u> </u>	15	7.5
	<u>200</u>	<u>100.0%</u>

or (from MPL)

	<u>Frequency</u>	<u>%</u>
13. Medical care (hospitals, doctors)		
yes <u> </u> <u> </u> <u> </u>	70	35.0%

(Note: One need tally only the frequency of affirmative responses for the MPL entries.)

For the final presentation of the MPL results, one need only re-order the MPL entries from highest to lowest in percentage of affirmative responses. For example, the sample questionnaire might yield these results:

RANK ORDER OF MPL LOCAL PROBLEMS

<u>Local problems</u>	<u>Priority: % who say yes</u>
Inflation	83%
Unemployment, job training	80%
Crime	78%
Taxes	73%
Pollution	65%
Schools, formal educational institutions	61%
Transportation problems	53%

This form of analysis provides the station with the basic information for the total community, but not for any sub-groups. Sub-group analysis generally requires access to computer facilities. Hand tabulation is possible for checking information comparing men with women, or more college-educated people with people lacking such education, but it is inefficient and more likely to contain errors.

Computer Tabulation

Mechanical data processing equipment can be a tremendous asset for digesting the community ascertainment data but only if it is correctly utilized by an experienced programmer. An inexperienced person cannot perform the same tasks without causing time losses by "learning" on your data or, even worse, by

producing an incorrect interpretation of your data which is mistakenly considered accurate by your staff. Presenting specific directions here showing how the ascertainment data could be processed by computer would probably confuse an inexperienced person while an experienced programmer may find them simply superfluous. We will therefore abstain from including such directions in this handbook. If access to data processing equipment can be obtained (local schools may be of assistance to those looking for low-cost computer time), the station's task will be considerably reduced but the job must not be left to a beginner.

SECTION V

ASCERTAINMENT OF THE GENERAL PUBLIC BY OTHER METHODS

The Commission has permitted public broadcast licensees, unlike commercial licensees, to use alternative methods to ascertain the needs and problems of the general public. Public stations may conduct periodic call-in programs, or public meetings, or a combination of both.

These are new methods, and the Commission has not set down any guidelines for the conduct of such call-in programs or public meetings. But it has noted that these methods can introduce "response bias" and bring forth a great volume of program preferences along with community problem discussions. When utilizing alternatives to random sampling of the general public, the licensee is expected "... to place the responses from the public in an overall ascertainment context and to take any response bias into consideration in programming to meet the needs of the whole public."⁹

Without guidelines and a format for the use of these methods, it is difficult to say just how formalized the station's procedures should be in this area. The benefit of these new methods will be that people calling in or attending public meetings probably formulate their conceptions of community problems before calling in or attending the meeting. Therefore, the MPL will be of little use, and the station will have to prepare its own methods for tabulating problems and needs noted. Since people will formulate problems in

⁹Report and Order, March 25, 1976, p. 12429.

their own way, their responses will be difficult to compare with the MPL categories. For example, one respondent might say that traffic congestion in the downtown area is causing pollution problems. Should that response be tabulated as a traffic problem or an environment/pollution problem -- or both? Flexibility of alternate methods over the random-survey might be offset markedly by the difficulty of computation and analysis of suggested problems and needs.

We suggest that alternative methods such as call-in programs or public meetings be well publicized beforehand. The station should keep careful records of notices that it carries on the air or publishes in other local media. This information then becomes part of the narrative statement (more fully explained in Section VII) to be submitted to the Commission.

One caution should be noted about use of either of the alternative methods as opposed to a full-scale random survey of the general public. Station licenses of all kinds are more generally coming under challenge at renewal time. Challenges often arise from minority groups and women's groups, charging that certain stations are heedless of the problems of minorities and women. If a station feels that it may come under challenge, the alternative methods of ascertaining the community may have distinct disadvantages. A charge of purposeful bias is difficult to substantiate if one has employed a random-sample technique, whose biases, if any, are limited to those inherent in the technique itself. Therefore, it is strongly urged that if there is a remote possibility that a station license may be challenged, it should seriously consider employing the random-sample method of ascertainment of the general public.

SECTION VI

ASCERTAINMENT BY PUBLIC RADIO

The Commission now requires public radio broadcasters (except those operating under Class D, 10-watt ~~authorizations~~ to ascertain their community's needs and interests. The procedures for radio are less formal than those demanded of public television stations. The Commission recognizes that public radio is not as well established financially as PTV and has consequently ruled that public radio applicants may use any reasonable method to ascertain their communities. Applicants are not freed from their obligation to ascertain their community problems, needs, and interests but they do not have to follow any specific methodological guidelines. Applicants must show that they know what issues concern the community and they must arrive at their conclusions through reasonable methods. Note however; the Commission has not defined what constitutes a reasonable method of ascertainment in the context of non-commercial radio. Presumably the public television techniques described elsewhere in this handbook will more than fill the radio ascertainment requirements.

A non-commercial radio station's method of ascertainment must be documented with a narrative statement detailing sources and methods used along with a summary of the principal problems discovered. This information must be filed with the FCC at license renewal time including a listing of programs broadcast during the preceding license term in response to community issues. These

two statements must be placed in the station's public file also.

Each year on the due date of the public radio station's renewal application, the station must place in its public file a listing of up to but no more than 10 significant problems and needs of the community discerned during the previous 12 months. This must be accompanied by a listing of typical and illustrative programs (excluding ordinary news of breaking events) broadcast during the previous 12 months in response to these problems and needs. The annual list of needs and programs for the previous two non-renewal years must also be submitted along with the renewal application. (The listings of problems and typical and illustrative programs should not exceed five pages.)

SECTION VII

PLAN FOR ASCERTAINMENT DATA UTILIZATION

Systematic ascertainment of community needs and problems is of limited value unless there is an equally systematic plan for utilizing the information provided by such ascertainment.

The three sources used in ascertainment - the demographic profile of the community of license, interviews with community leaders, and with the general public - complement each other and can be used most successfully in relation to each other. The community leader consultation must be organized for convenient use and placed in the public file. The general public survey data must be evaluated and a narrative statement of the findings placed in the public file.

FCC Requirements for Public File and Ascertainment Reporting

The Federal Communications Commission requires certain procedures and steps for handling and submitting these materials to it. Each year, all public broadcast stations are required on the due date of license application (if your renewal application is due on June 1 of a given year, then this means June 1 every year)¹⁰ to deposit in their public files a listing of the 10 most important problems and needs discerned in the community during the previous 12 months, along with a listing of typical and illustrative programs broadcast during that 12-month period in response to those problems and needs. This listing should not exceed five pages. The materials derived from the demographic

¹⁰ The FCC regulations are effective May 3, 1976, for all licensees whose authorizations expire August 1, 1977, and thereafter.

study, the leadership survey, and the general public survey (excluding actual interview sheets of the general public) must be placed in the station's public file within a reasonable time after completion of the surveys. (Individual Leader Contact forms must normally be placed in the public file within 45 days of the completion of the interview.)

At the time of filing the application for renewal of license, the FCC Community Leader Checklist discussed earlier, with the number of leaders contacted under each element during the current license period, must be placed in the station's public file.

The demographic profile, the Leader Contact forms, the FCC Community Leader Checklist, and the problems and needs/typical program listing (for the entire license period) must all be filed along with the license renewal application. Materials on the general public survey need not be filed with the renewal application. Instead, a narrative statement on the general public ascertainment findings is to be filed according to the method utilized:

- (a) If a random general public survey was conducted, then file a narrative statement, not to exceed five pages, of the methods followed in conducting it, including the number of people surveyed and a breakdown by age, race, sex, and the study results.
- (b) If a periodic call-in program was used, then file a narrative statement for each such program describing the numbers of persons calling in, the duration of the program(s), the manner in which the public was notified about the airing of the program, the issues discussed, and other relevant descriptive material.
- (c) If periodic public meetings were used, then file a narrative statement for each such meeting describing the time and place of the meeting, the approximate numbers of persons present and speaking, the duration of the meeting, the manner in which the public was notified about the meeting, the issues discussed, the names and titles of station representatives present, and other relevant descriptive material.

In addition to meeting the Commission's requirements for filing and reporting, a station can benefit from working out a method of utilizing the materials for its own general purposes and for programming purposes.

The Itemized Master Problem List (MPL)

The Itemized Master Problem List is an organizational device designed to show the status of community problems found through the ascertainment study. The Itemized MPL contains five columns: Problem Items, General Public Survey Priority, Station-Assigned Priority, Programs Broadcast, and Programs Planned. All five will be discussed below.

Column One: Problem Items

The questionnaire from the general public survey should be tabulated and summarized. The originals should be retained at least until a final report is prepared; they may then be discarded. A categorization system is necessary for convenient reference. The MPL, described above in Section III, provides a category list that should include most types of problems encountered. The 19 main items on the MPL can serve as main headings for the file.

Issues more specific than the general MPL categories will be brought up by leaders, e.g., "commercial encroachment, residential areas" noted on the itemized MPL, column three. (See page 56.) Short labels or key word descriptions for such issues (column one of the Itemized MPL has examples) permit convenient identification of sub-MPL category concerns without using much space.

ITEMIZED MASTER PROBLEM LIST

(1)	(2)	(3)	(4)	(5)
Problem Items	General Public Survey Priority	Station- Assigned Priority	Programs Broadcast	Programs Planned
<u>(MPL Category)</u> City size, zoning, districting <u>(Specific Issues)</u> Commercial encroachment, residential areas Population density, Lincoln School neighbor- hood Change in school boundaries	5th of 20	 1 1 2	 6/10/75 News 7/5/75 Public Forum 6/7/75 Issues in Education 7/11/75 Community Relations	 8/75 Public Forum
<u>(MPL Category)</u> Community decay or renova- tion <u>(Specific Issues)</u> Refuse in streets Poor maintenance, Stanley Park	3rd of 20	 2 1	 6/19/75 Mayor Answers	 8/75 Mayor Answers 9/75 Public Forum

Column Two: General Public Survey Priority

The General Public Survey Priority column should indicate the rank of each problem as determined by the public survey. This rank applies only to the Master Problem List headings and not to key word descriptions. The list should be updated periodically to accommodate new problems disclosed by the continuing ascertainment process.

Column Three: Station-Assigned Priority

It is necessary for station personnel to give priorities to specific problem items so that the most important are singled out for closer attention. We suggest a system that sets three priorities. The station management should rate each sub-problem identified by community leaders as being one of these three priorities.

1. A critical problem that should be given continual attention in broadcasts
2. An important problem deserving broadcast attention
3. Problems not especially immediate or important, or that do not lend themselves well to broadcast treatment.

These rankings are given to specific issues cited by community leaders as they have been placed into MPL categories.

Several factors should enter into the relative judgment imposed by this three-level system. The public priority already on the chart should be the first criterion considered in at least two ways. If the public gives the main problem category a high priority ranking, it is obviously salient; the problem is shown to be important to people of the community, and there is probably an audience for programming about the problem. If, on the other hand, the priority given the problem by the public is low, yet it seems to be important to community leaders and the station staff, there may well be a lack of public awareness. In that case, the station could choose to give the

problem category a high priority in an attempt to raise the level of awareness or interest about it.

Another criterion for making these judgments is the extent of involvement of other media in the community. The amount of attention already being given any problem by other media may influence the priority that the station gives it.

A simple counting of leaders mentioning a problem should not be a criterion. A single leader with a particularly unique or sophisticated insight into a problem may influence the problem's priority although no other leaders share the viewpoint. This is not to say that the number of leaders mentioning an issue is irrelevant but that quantitative indicators should be kept in perspective.

Another management technique could be the formation of a committee of station personnel to evaluate the station's consultations with community leaders. The committee need not actually meet together for this purpose. The completed leader contact forms can be circulated to the committee with the identifying key word descriptions at the top of each page. Members of the committee can rank them on a separate sheet (1 - critical problem, 2 - important, 3 - not immediate). The average priority rank can then be worked out (rounded off to a single digit - either 1, 2, or 3). A record of these deliberations could then be placed in the station's public file.

Columns Four and Five: Programs Broadcast and Planned

Once a month, the committee involved in the community leader consultations and the priority rankings of problems could meet to review the Itemized Master Problem List. In column 4 of this list, programs and dates on which the problem was treated should be listed. If convenient, the program director could do this before the monthly meeting.

When the programs have been related to the problems, it can then be seen at a glance which areas have been treated adequately and which have been neglected. If problems of the first priority have not had programming attention, plans could be made to provide some broadcast time. The principal objective of the meeting, then, is to plan programming to treat first-priority problems. Most such problems can be treated in the ongoing public affairs programs of the station. Other topics might best be treated in a special program. Whatever the case, the listing of problems by priority serves as a checklist so that the station continually reviews the problems of the community and makes use of the collected ascertainment data. (And records of such meetings should be kept for the public file.)

APPENDIX ONE

FCC COMMUNITY LEADER CHECKLIST WITH REPRESENTATIVE EXAMPLES OF GROUPS AND ORGANIZATIONS

1. Agriculture --- local Department of Agriculture office, the Grange, county agent
2. Business --- Chamber of Commerce, officers of industrial and business corporations, local merchants
3. Charities --- United Fund, Community Chest, Heart Fund, local charity drive representatives
4. Civic, neighborhood, and fraternal organizations --- Junior Chamber of Commerce, Elks, Lions, Toastmasters and Toastmistresses
5. Consumer services --- Better Business Bureau, state or local consumer agencies
6. Culture --- art galleries, opera societies, libraries, theatrical and little theater groups
7. Education --- colleges and universities, high schools, elementary schools, adult education programs, state and local educational and school board officials
8. Environment --- federal, state, and local environmental offices, Audubon Society, Sierra Club, local planning departments
9. Government (local, state, and federal) --- mayor, councilpersons, members of the judiciary, governor, governmental agency heads
10. Labor --- officials of labor unions
11. Military --- local base commanders, recruiting officers
12. Minority and ethnic groups --- NAACP, any group or organization of minorities that have significant representation in the community, e.g., native American, black, Hispanic, Asian-Pacific, Italian-American, etc.
13. Organizations of and for the elderly --- American Association of Retired People, Social Security Administrator
14. Organizations of and for women --- NOW, DAR, League of Women Voters
15. Organizations of and for children, youth, and students --- YMCA, YWCA, 4H, Boy Scouts, Girl Scouts, student government leaders
16. Professions --- lawyers, doctors, dentists
17. Public safety, health, and welfare --- Police Department, Fire Department, Department of Health and Welfare offices, social services, public welfare clinics
18. Recreation --- Department of Recreation, Boys' Clubs, Park Service
19. Religion --- ministers, pastors, rabbis, and priests from all religions significant in the community
20. Other --- leaders of any significant group or organization that is represented in the community and not otherwise included in any of the above elements.

APPENDIX TWO

FCC PUBLIC INFORMATION REQUIREMENTS

1. Materials to be placed in the stations' public file annually:
A listing of the 10 most important problems and needs discerned in the previous 12-month period along with a listing of typical and illustrative programs broadcast during that 12-month period in response to those problems and needs. (Due on date of renewal application each year.)
2. Materials to be placed in the public file within 30-45 days of availability:
The materials derived from the demographic study, the leadership survey, and the general public survey (excluding actual interview sheets of the general public).
3. Materials due in the public file at the time of filing the application for renewal of license:
The FCC Community Leader Checklist with the number of leaders contacted under each element during the current license period.
4. Materials to be filed with the application for renewal of license:
The demographic profile, the Leader Contact forms, the FCC Community Leader Checklist, and the problems and needs/typical program listing for the entire license period. A narrative statement on the general public ascertainment findings must be included at this time also.

APPENDIX THREE

ASCERTAINMENT OF COMMUNITY PROBLEMS BY NONCOMMERCIAL
EDUCATIONAL BROADCAST APPLICANTS, PERMITTEES, AND LICENSEES

FCC REPORT AND ORDER

federal register

THURSDAY, MARCH 25, 1976



PART II:

FEDERAL COMMUNICATIONS COMMISSION

■

**Ascertainment of Community Problems
by Noncommercial Educational
Broadcast Applicants, Permittees
and Licensees**

Title 47—Telecommunication

CHAPTER I—FEDERAL COMMUNICATIONS COMMISSION

[FCC 76-234; Docket No. 19816, RM 1851, RM 1874]

PART 1—PRACTICE AND PROCEDURE

Renewal of Noncommercial Educational Broadcast Licenses

In the Matter of Ascertainment of Community Problems by Noncommercial Educational Broadcast Applicants; Amendment of Section IV (Statement of Program Service) of FCC Broadcast Application Forms 340 and 342 (Noncommercial Educational Broadcast Applications); and Formulation of Rules and Policies Relating to the Renewal of Noncommercial Educational Broadcast Licenses.

1. On August 14, 1975, the Commission released a *Further Notice of Inquiry and Further Notice of Proposed Rulemaking* in Docket No. 19816.¹ The *Further Notice* proposed rules formalizing the methods by which noncommercial educational broadcast applicants were to ascertain the needs and interests of their communities.² Thirty-six comments were filed by noncommercial broadcast licensees, agencies affiliated with them, individuals, and public interest groups.³ The background of this proceeding is sketched out below, followed by a summary of the comments received and a discussion of the rules adopted.

BACKGROUND

2. It is firmly established Commission policy that broadcast licensees, both commercial and noncommercial, must ascertain the needs and interests of their communities and must program to meet those needs. *Report and Statement of Policy Re: Commission En Banc Pro-*

gramming Inquiry, 44 FCC 2303 (1960); *Alabama Educational Television Commission*, 50 FCC 2d 461 (1975). Prior to 1971, the methods of ascertainment were left largely to the licensee. However, in 1971, the Commission acted in response to numerous requests that ascertainment procedures no longer be permitted to evolve on an *ad hoc* basis and adopted a *Primer* introducing a more specific methodology to ascertainment policy for commercial broadcast licensees. The Commission indicated that the 1971 *Primer* was intended for new licensees or for licensees proposing to serve significant new areas but that it would apply to renewal applicants on an interim basis only. Noncommercial broadcast applicants were to be excluded from the formal ascertainment requirements because "... given the reservation of channels for specialized kinds of programming, educational stations manifestly must be treated differently than commercial stations." 27 FCC 2d at 651.

3. On September 11, 1973, the Commission released a *Notice of Inquiry and Notice of Proposed Rulemaking*, 42 FCC 2d 690, in this docket in response to petitions for rulemaking filed by a number of parties requesting that we extend formal ascertainment procedures to noncommercial broadcast licensees. They argued, *inter alia*, that these licensees are no longer purely educational licensees offering in-school instructional programming, but that they have come to provide "public" programming to the community at large which often competes with the programming of commercial licensees. Therefore, it was said, they should be required to ascertain the needs of their communities in the same fashion as commercial licensees.

THE COMMISSION PROPOSAL

4. On August 14, 1975, the Commission released a *Further Notice of Inquiry and Further Notice of Proposed Rulemaking*, *supra*. These proposals were similar to those made for commercial renewal applicants in the *Further Notice of Inquiry and Further Notice of Proposed Rulemaking* in Docket 19715, 53 FCC 2d 3, 40 Fed. Reg. 22092 (1975), although allowances were made, e.g., for such educational broadcasting phenomena as extremely low-power (10 watt) stations and heavy reliance on volunteers. They were intended to apply to all noncommercial educational applications, renewal and otherwise.

5. The Commission proposed that noncommercial applicants for existing, new or modified broadcast facilities conduct interviews with leaders of significant groups found in their service areas and with members of the general public, as had been required of all commercial licensees to that point. All such applicants would interview leaders from categories set out in a Community Leader Checklist. Members of the general public would be interviewed through a roughly random sampling of the community. The documentation requirements of ascertainment were to include: placement in the public file of a narrative statement

describing the methods used to ascertain members of the general public and the results obtained; summaries of interviews with community leaders; and a problems-programs list—yearly and retrospective for existing licensees, full-term and prospective for new applicants.

6. Relative flexibility was proposed in the format and level of these interviews for noncommercial educational applicants. The Commission proposed to allow volunteers as well as employees or outside statistical research firms to carry out the general public survey. The Commission proposed that up to 50% of the leadership interviews be permitted to be conducted by non-management level personnel or volunteers, and that the format of these interviews be liberalized to allow methods other than formal face-to-face contacts.

7. "Instructional" programs were found to be specifically within the expertise of educational or governmental agencies established to develop them, and therefore an inappropriate subject for ascertainment. The *Further Notice* pointed out, however, that this did not preclude ascertainment of community needs and interests which could be served in an educational program format, but that it referred to ascertainment directed toward in-school forms of instructional programming.

8. With the exception of 10-watt FM stations, the Commission proposed to promulgate similar rules for radio and television licensees. These 10-watt stations generally provide a city-grade signal with a radius of only a mile or so, and are generally licensed to educational institutions. Thus, the Commission believed that it would be impractical to require these stations to ascertain the needs and interests of their communities because most such signals do not even cover their entire communities. Also, the Commission proposed to extend a suggested commercial "small market" exemption to noncommercial licensees.⁴ That exemption would relieve stations licensed to communities with populations of 4,000 or fewer persons, and outside any Standard Metropolitan Statistical Area (SMSA), from most formal aspects of the ascertainment rules, with the notable exception of the annual problems-programs lists. (Para. 48, *infra*)

9. The Commission proposed that statewide networks be required to conduct a local ascertainment of community needs and interests in each community for which they hold a license to operate a station. A number of other proposals were made, some of which were decided to be inadvisable in adoption of the commercial renewal ascertainment policy. These will be discussed below.

10. On December 15, 1975, the Commission adopted a unique ascertainment procedure for commercial renewal applicants. (Note 2, *supra*; hereinafter

⁴ The commercial small-market exemption was adopted in the *First Report and Order*, *supra*.

¹ *Ascertainment of Community Problems by Noncommercial Broadcast Applicants*, 54 FCC 2d 766 (1975). The rule as contained in a proposed Section 1.527 took such language from the present Section 1.526 as is currently in force for all applicants, permittees and licensees—commercial and noncommercial educational—and repeated it, as appropriate, for noncommercial educational broadcasters. Thus, in this proceeding, we are not only creating a new Section 1.527 to apply to the noncommercial educational situation, but also amending Section 1.526 to restrict it to broadcasters governed by the rules for commercial stations.

² Hereinafter, "noncommercial educational" is shortened to "noncommercial" for purposes of this document. Ascertainment for commercial applicants is governed by the *First Report and Order* in Docket 19715, FCC 75-1361, released January 7, 1976, 41 Fed. Reg. 1372 (renewal only), and by the 1971 *Primer on Ascertainment of Community Problems by Broadcast Applicants*, 27 FCC 2d 650 (other than renewal of license).

³ See Appendix B. The period for filing comments was extended from September 15, 1975 to October 7, 1975. No reply comments were requested. We accept the late-filed comments of Spring Harbor College Communications, Inc. and E. Harold Munn, Jr.; the President's Committee on Employment of the Handicapped; and Alaska Public Television, Inc.

Renewal Primer) Existing licensees were to continue to ascertain community needs and interests through contact with community leaders and members of the general public, as is required of applicants under the 1971 *Primer*. However, the Commission chose to require existing licensees to ascertain community needs and interests on a continuous basis throughout the license term, rather than in the six months prior to filing the pertinent application. Also, they were no longer to be required to conduct compositional studies of their communities. Instead, the field of choice of leaders to be interviewed was set out in a list of common community elements, the Community Leader Checklist. In consideration of these licensees' past experience within their communities, greater flexibility in the format and level of leader interviews was established. Finally, the Commission extended to radio the requirement—previously applicable to TV stations—that licensees place in their public files a list of up to ten significant problems ascertained in the preceding twelve months and illustrative examples of programs broadcast during that period to meet those needs. This latter obligation would devolve upon small-market licensees as well as others.

SUMMARY OF COMMENTS

11. In the *Further Notice*, we stated that the role of noncommercial educational broadcasting has never been precisely defined, but declined to do so in this proceeding because we believed that "the flexibility and freedom of the service, is, in large part, fundamental to its existence." We recognized that it was not the legislative intent of Congress to limit these broadcasters solely to educational and cultural programming, but that the Communications Act of 1934, as amended in 1967, expressed a Congressional finding "that expansion and development of noncommercial educational radio and television broadcasting and of diversity of its programming depend on freedom, imagination, and initiative on both the local and national levels." 47 U.S.C. 396(a) (2). We concluded that:

In establishing an ascertainment process for noncommercial broadcasters, we shall not attempt to relate the purpose of the ascertainment to the special "role" of the service as we might view it. Whatever the distinct role of public broadcasting may be, it should evolve as the service matures, and not be defined and imposed by the government. *Further Notice*, at 755.

12. A number of commenters nevertheless have asked that we consider the special role of the noncommercial broadcaster in promulgation of these rules. The Corporation for Public Broadcasting (CPB) states that its:

Primary concern deals with the "focus" of the ascertainment procedure. Any ascertainment procedure that is required of noncommercial broadcasters should not be restricted merely to ascertainment of the "problems" of a community, or "needs" in a synonymous sense. The term "problems" should be interpreted broadly to include "interests and needs" in the sense of those life-

enriching interests that are not served, or are not adequately served in the commercial broadcasting sector.

While CPB thus argues for widening the scope of ascertainment, Clark County School District (Clark County),⁵ the University of Northern Colorado, and John H. Schmidt focus on an aspect of public broadcasting that they believe argues against imposing on noncommercial educational licensees ascertainment requirements as broad as those required for commercial licensees. They observe, as we did in our *Notice of Inquiry*, that the public broadcaster programs to meet the cultural and informational interests often given minimal attention by commercial broadcasters who normally program to reach a large mass audience. The noncommercial service can tolerate audiences that would spell immediate disaster in the commercial service. Thus, the University of Northern Colorado states that "ascertainment surveys tend to project majority preference" and the "Commission should make it clear that public noncommercial stations can make valuable contributions while programming to needs which reflect only slightly in ascertainment surveys."

13. An aspect of the special role of public television that received comment from well over a majority of the commenters, particularly those commenters who hold licenses for educational radio stations, was the observation that educational broadcasters forgo profit in the interest of special service to the public. This feature of the service, they argue, places effective use of staff and money at a premium and diversion of these limited resources to completion of the proposed formalized ascertainment will result in a diminution of direct service to the community without appreciable benefit. While most commenters agree that some form of ascertainment should be required, many maintain that more flexible methods should be permitted. CPB suggests that the Commission "fine tune" the requirements of ascertainment to the unique nature of the service, and that the Commission consider methods not currently permitted in ascertainment of community needs by commercial broadcasters, such as viewer advisory panels, community "feedback" systems, and regular public forums. Arkansas State University Public Radio Service (Arkansas State) suggests that we require noncommercial broadcast licensees to submit a listing of five or six community problems which the station feels it can best serve, a statement as to how those problems were determined and a list of illustrative programs that the licensee proposes to air to meet those problems. The Association of Public Radio Stations (APRS) suggests that the Commission permit each non-commercial educational broadcaster to determine its own ascertain-

⁵ This is a joint filing by Clark County, Educational Broadcasting Corporation and the University of Alaska. In addition, Alaska Public Television, Inc. asked that it be associated with these comments.

ment methodology as best suits its local conditions.

14. The National Citizens Committee for Broadcasting (NCCB) and National Black Media Coalition (NBMC) in a jointly filed comment, state that the funding sources and special Commission-granted status for public broadcasters confer a particular duty on these licensees to ascertain community needs and that this view is supported by the Commission decision in *Alabama Educational Television Commission*, *supra*. They argue, as does the United Church of Christ (UCC), that public broadcasters should be held to the rigorous standards of the 1971 *Primer*. NCCB-NBMC add, however, that more innovative approaches to ascertainment should be expected of public broadcasters, and would require regular meetings with a community advisory board or "comparable mechanism," in addition to 1971 *Primer* requirements. The New Jersey Coalition for Fair Broadcasting (Coalition) suggests that the Commission replace the general public survey with use of public access programming, public meetings with station policy makers, permanent community advisory boards, and other methods which encourage dialogue between the licensee and the community it serves.

INTERVIEWS WITH COMMUNITY LEADERS

15. As indicated in the preceding section, a number of commenters believe that formalized ascertainment would be too burdensome and costly for noncommercial educational broadcasters. They generally argue for a more flexible form of ascertainment. On the other hand, some believe that rigorous 1971 *Primer* style ascertainment should be required for these licensees. Little comment was received that otherwise questions the appropriateness of imposing the requirement that these licensees interview leaders of significant groups found in their communities of license and service areas, although procedural aspects were discussed. In the *Further Notice* we stated that a licensee who conducted at least one leadership interview per Checklist category during each year of the license term would be presumed to have conducted an adequate leadership survey. CPB argues against this presumption, stating that it would lull broadcasters into a false sense of achievement. As regards the Checklist, which records the numbers and categories of leadership interviews, Clark County suggests that we require that this be completed on a triennial rather than annual basis.⁶ NCCB-NBMC and the Coalition request that licensees be required to indicate how many women and minorities were interviewed in each category. The National Federation of Community Broadcasters advises that we require such a breakout for all

⁶ The Committee for Community Access and the President's Committee on Employment of the handicapped request that we add "Media" and "Handicapped," respectively, to the Checklist categories.

leadership interviews conducted by management level personnel.

16. In the *Further Notice* we proposed to allow up to 50 percent of the leadership interviews to be conducted by non-management-level employees or by volunteers. Clark County states that we should shift from requiring 50 percent of these interviews to be conducted by management-level personnel to a requirement that management-level personnel interview at least one leader in each category during the license term. NCCB argues that management-level personnel should be present during all interviews. APRS, which states that it is a dues-supported organization representing the majority of CPB-qualified stations, describes noncommercial stations as largely drawing "their lifeblood from the contributions of volunteer workers." It maintains that "without volunteers, the clear majority of public radio stations would fall silent." APRS states that these volunteers are spread throughout these stations' operations filling a wide variety of technical and on-the-air positions. WPKN adds that:

A majority of noncommercial radio stations depend heavily upon student volunteers to staff their operations. Salaried full-time professionals are the exception, rather than the rule. . . . Most student staffed stations, regardless of power, do not count even one full-time professional employee on their staff. In these cases, "managerial level" and "volunteer" mean the same thing.

John H. Schmidt, Temple University, and the National Federation of Community Broadcasters, recommend, therefore, that the Commission treat management-level volunteers as management-level employees for the purposes of completing these stations' ascertainment requirements. On the other hand, the University of New Haven posits that imposition of formal ascertainment requirements on stations that rely heavily on volunteers for their operation may affect the size of the volunteer pool available to these stations: "Out in the real world, when volunteers are forced to do anything, they cease volunteering."

17. We proposed a liberalization of 1971 *Primer* policy for noncommercial educational broadcast licensees to permit considerable flexibility in planning leader surveys. Acceptable methods would include group meetings, on-the-air interviews, town hall setting, chance encounters, telephone interviews, etc. The Association of Public Radio Stations and Charles E. Buzzard recommend that the Commission permit any combination or blending of community leader surveys, monthly call-in programs or semi-annual meetings to satisfy a licensee's ascertainment obligations. Temple University suggests that liberal use of telephone interviews be permitted and that licensees be permitted to conduct all interviews outside of its community over the telephone. Arguing for greater formality in these interviews, the Advisory Council of National Organizations maintains that chance encounters should be entitled to less weight than other methods. NCCB-

NBMC and the Coalition ask that we require licensees to inform the interviewee of the purpose of the interview.

THE GENERAL PUBLIC SURVEY

18. We proposed to extend to noncommercial applicants the requirement that they conduct a random survey of their community of license and those other communities within their service area that they are serving or propose to serve. Comments were requested on whether the purposes of the public survey might be met adequately by: the traditional random sampling; a monthly call-in program inviting members of the public to discuss the problems and needs of their community; or semi-annual public meetings where these matters are discussed. We stated that we were not convinced that the latter two methods would be appropriate substitutes for the traditional random sampling method.

19. Responses recommend that the suggested alternative methods be, to some extent, incorporated into the ascertainment process. As indicated above (para. 14), NCCB-NBMC argues that such methods be required in addition 1971 *Primer* requirements while the Coalition views these and other suggestions as optional methods. The Office of Civil Rights of the Department of Health, Education, and Welfare (HEW) recommends that Citizens Advisory Committees be required as an adjunct of the general public survey. APRS, the National Association of Educational Broadcasters (NAEB), CPB and the Maryland Center for Public Broadcasters are also among those favoring substitution of the optional methods for the proposed general public survey requirements. WPKN states that call-in options to the general public survey are the most reasonable method for ascertainment of community needs and interests by student-staffed stations. The National Federation of Community Broadcasters supports flexible procedures but advises that we require ascertainment of more than merely a station's listenership in order to reflect the needs of a broader community.

20. In another vein, HEW states that conduct of public surveys only once during the license term is insufficient to keep pace with the considerable change of problems and needs within a community, "particularly so in the case of minority groups and women who may endeavor to improve their economic and legal positions through governmental equal opportunity regulations and changing societal attitudes." APRS and West Virginia Wesleyan College ask that we permit responses to the general public survey to be collected through the mails.

ASCERTAINMENT OF INSTRUCTIONAL NEEDS

21. The *Further Notice* distinguished "instructional" programming from "public" programming, indicating that we did not propose to require that noncommercial educational licensees ascertain the instructional needs of their communities. We specified that we considered instructional programming to be those forms of programming designed for use by any

level of educational institution in the regular instructional program of the institution. We attempted to make clear that this does not mean that programs of general educational interest are considered instructional. We concluded that stations devoting 100 percent of their on-air time to instructional programming would not be required to ascertain the needs and interests of their communities.

22. The Maryland Center for Public Broadcasting and the Georgia State Board of Education support this view. The former states that it ascertains instructional needs by using an advisory board composed of representatives of every school district in the state. The latter argues that in many states, including Georgia, instructional programming is developed by the agency charged by the state or local government with the responsibility for education in the station's service area. CPB submits examples of methods currently employed by noncommercial educational licensees to assess instructional needs. It supports the procedures currently in use, but contends that exempting instructional broadcasters from ascertainment requirements:

Is, ironically, to make of educational broadcasting a stepchild in its own homeland. While ascertaining these needs is only one part of the productive process—contact with the agencies and institutions now dealing with those needs, the universities, community and private colleges, and a variety of agencies offering adult informal education is also required—the basic step, understanding those needs, should not be left to chance. CPB urges the Commission to clarify its position by stating that a broadcaster has a responsibility to ascertain the general instructional needs of its community, which include inquiry as to general instructional and educational program needs, such as college courses, "how to do it," adult informal, classroom programming, etc.

10-WATT STATIONS

23. The limited range of most 10-watt stations—rarely placing a 1 mV/m signal beyond 5 miles—and their general use as training grounds for broadcast personnel, *inter alia*, led us to propose in the *Further Notice* that these stations be exempt from all ascertainment requirements. We noted that our policy in treating 10-watt stations differently than those with greater power is reflected in our Rules which permit 10-watt licensees to operate without meeting some of the technical requirements imposed upon all other licensees. See 47 C.F.R. § 73.501 *et seq.* The proposed exemption was supported by Southern Keswick, Inc., the National Association of Educational Broadcasters, and Clark County.

24. A number of comments opposed this exemption. CPB suggests that the Commission substitute flexible procedures for all broadcast licensees and allow no exemptions. It contends that the limited coverage of the 10-watt signal should make ascertainment easier to carry out. CPB, the University of Northern Colorado, and in a joint comment, 14 licensees, (see Connecticut Educational Television Corporation, Appendix B)

contend that failure to require ascertainment by 10-watt licensees results in inefficient use of the spectrum, since these stations may block the implementation of a higher-power station that will serve a larger portion of the community, and in that way serve a greater number of needs. Finally APRS maintains that if training is one of the main purposes of these stations, ascertainment methodology should not be excluded from that training.

STATE BROADCAST NETWORKS

25. The *Further Notice* observed that the existence of noncommercial state broadcast networks is one of the unique features of public broadcasting which makes the traditional ascertainment policy difficult to apply. It is common for a state network to originate its programming at one station and employ the others as "satellite-like" operations. Responding to the argument that statewide ascertainment should be permitted for these licenses we concluded that:

We do not believe that the implications of statewide ascertainment can be reconciled with the local service policy which underlies our allocation of frequencies. We feel that state networks must conduct their ascertainment efforts so as to make contact with both leaders and the general public at the local level. The fact the staff per station ratio may be lower than average for certain state networks will, however, be a factor when judging the representativeness of their ascertainment effort.

26. UCC supports this view, while the Coalition maintains that state networks should be required to ascertain on both the state and local level. The Alabama Educational Television Commission supports local ascertainment by state networks, but believes that it is not feasible to have management-level participation in the process where the state network does not maintain management-level employees at each station. CPB strongly endorsed our proposal for local ascertainment, stating:

Community service is the very essence of public broadcasting and the mere form of organization of the licensee should not become an excuse for overlooking the cultural, economic, and ethnic diversity of geographically separated units within the same jurisdiction, or the consequent diversity of the needs and interests manifest from unit to unit.

CPB goes on to say that its criteria for community service grants encourage the localization of State network program service by providing that each "station" within the State network may qualify for a separate grant, if it meets the basic local service requirements.

27. Strong dissent to this proposed rule was voiced by the Georgia State Board of Education (Georgia State), the Maryland Center for Public Broadcasting, NAEB, and in the joint comment of 14 broadcasters. They maintain that the allocation policy for state networks is not based on a general assumption of local service. The parties to the joint comments argue that in 1965 the Commission recognized that educational service

in many states depended on deemphasizing local service and that economic factors prevented the ideal of building a local outlet for each major population center. They quote the *Fourth Report and Order* in Docket No. 14229:

With respect to educational reservations, where individual States have submitted statewide plans, we have generally provided the channels required for statewide coverage of at least one educational service. In States where no formal statewide plan was submitted we chose appropriate cities from among those recommended by the NAEB so that if stations are constructed on these channels they will provide reception to all parts of the State. 41 FCC 1082, 1088, 5-RR 2d 1587, 1593 (1965).

Numerous other citations and quotes were provided to bolster the argument that we assigned these channels on the basis of state coverage rather than local coverage.

28. Georgia State holds licenses for eight television stations. Five of these, we are told, are licensed to communities which range in size from 2,214 to 5,300 persons. Thus, it concludes "to rely on ascertainment efforts concentrated in these few communities to determine the needs of the State would be to blink reality". Georgia State contends that this ascertainment proposal raises the prospect of jeopardizing investments made by States in "good faith reliance" on Commission grants for statewide service. A number of the objectors contended that the mode of operation—originating programming from one station and employing the others in a "satellite-like" fashion—is the only one that these networks can afford. The joint comment stated, for example, that "Nebraska's choice has been between quality statewide service originated from one location or no statewide service." It suggests that the level of local ascertainment should perhaps, be keyed to the level of local origination.

SMALL MARKET EXEMPTION

29. The proposed small-market exemption would remove all educational broadcast stations licensed to communities with a population of 10,000 or fewer persons situated outside any Standard Metropolitan Statistical Area (SMSA) from any Commission inquiry into the manner in which they became aware of community problems and needs. This exemption was proposed as a test of the hypothesis that a broadcaster in a small community knows thoroughly the problems and needs of his town. It was accompanied, however, by a proposal that exempt licensees along with those not exempt deposit each year in their public files, cumulatively, for eventual submission with their renewal applications at the end of each three-year term, a list of up to 10 significant problems found in the community during the preceding 12 months, and illustrative programs addressed to those problems. For new applicants, the problems listed were to be current and the programs prospective.

30. A number of commenters suggested that licensees of stations in communities larger than 10,000 can also be presumed

to know their communities thoroughly and higher ceilings were suggested. Southern Keswick supports this exemption, but suggests that we also exempt stations with fewer than five employees, as we do for the filing of Annual Employment Reports (FCC Form 395). The University of New Haven suggests the same exemption. The National Federation of Community Broadcasters supports such an exemption, but suggests that implementation of more flexible methods of ascertainment would be a better approach.

31. A number of commenters oppose the proposed exemption. The Coalition states that there are no facts to support the hypothesis that these licensees know their communities thoroughly, and even if there were there would certainly be exceptions to this rule. UCC maintains that ascertainment documentation is especially needed in small communities, where "town-gown" relationships are often strained. NCCB argues with the premise of the proposed exemptions and suggests that open channels for community feedback, or town hall forums may be suitable ascertainment methods for small community licensees. HEW believes that adoption of this exemption could have a potential adverse effect through exclusion of racial and ethnic minorities from ascertainment surveys. Finally, CPB contends that it finds it difficult to accept the assumption that these licensees know their communities so well that their service patterns to their communities cannot be improved. Further, they contend that this proposal appears to acknowledge that the proposed ascertainment procedures are too rigid. It, therefore, suggests that the Commission consider more flexible procedures and abandon the proposed small market exemption.

32. We note at this point that while many of the proposals made in the *Further Notice* received little comment in this proceeding, they were covered extensively in response to the *Further Notice of Inquiry and Notice of Proposed Rulemaking* in Docket 19715, 53 FCC 2d 3 (1975), which dealt with commercial renewal applications. Thus, our discussion of these proposals below may rely upon, and even incorporate, the discussion in the Docket 19715 *First Report, supra*.

DISCUSSION

33. Congress, in amending the Communications Act through the Public Broadcasting Act of 1967, declared:

that it furthers the general welfare to encourage noncommercial educational radio and television broadcast programming which will be responsive to the interests of people both in particular localities and throughout the United States and which will constitute an expression of diversity and excellence. 47 U.S.C. 396.

It is evident that the role of the non-commercial educational service has grown from purely "instructional programming" to include a broader variety of "public programming." It appears that many public broadcasters can and do program to meet cultural and informa-

tional interests often given minimal attention by commercial broadcasters, thus appealing to smaller audiences than commercial broadcasters could serve on a profitable basis. Lastly, noncommercial broadcasters generally operate under closer financial constraints than commercial licensees.

34. To the extent that noncommercial educational broadcasters fill special roles, these need not be the same for radio and television. In the view of one chief sponsor, educational radio service is not nearly as developed as its television counterpart.⁷ It appears that CPB's extensive involvement in public television is not matched in the radio service, where more than half of all licensees do not possess the minimum qualifications for CPB assistance.⁸ Not only is the governmental or institutional financial support for educational radio typically less firm than for educational TV, but it remains to be seen whether this form of radio will develop substantial dollar contributions from listeners in the way ETV has from its viewers. At the same time, educational radio's need or ability to survive without government assistance or listener contributions may represent its greatest opportunity for diverse, small-audience programming that is truly distinctive. For these reasons, we adopt here an ascertainment for radio which is less formal than that for ETV, but which nevertheless brings both services into the process of documented community surveying for the first time.

35. *Scope.* Under the 1971 *Primer*, *supra*, the principal obligation of an applicant or existing licensee to ascertain within its community of license—with a secondary obligation to survey areas outside the community falling under its signal—has become well established and we need not discuss it here. A number of commenters contended that since their funding, as public broadcasters, is provided by local and state governments, such financing would not be available for ascertainment surveys going beyond these jurisdictions. We are not persuaded that the costs or other burdens of interviewing leaders who can be expected to possess a "broad overview" of problems outside the license community would be so great as to raise objections from providers of funds. Accordingly, as proposed in the *Further Notice* in this proceeding, and as decided in the *First Report* on commercial renewal ascertainment, we shall adhere to the 1971 *Primer's* discussion of primary and secondary ascertainment responsibility in evaluating educational applications.

⁷ See Statement of Henry Loomis, President of Corporation for Public Broadcasting, Before the HEW Subcommittee of the Committee on Appropriations, U.S. House of Representatives on February 6, 1976, 94th Cong., 2d Sess. (Appropriations under PL 94-192); and *Hearings on H.R. 4563 Before the Subcommittee on Communications of the House Comm. on Interstate and Foreign Commerce*, 94th Congress, 1st Session, ser. 94-34, at 203 (1975).

⁸ *Policy for Public Radio Station Assistance—Qualifying Stations*, CPB (1975).

36. *Timing of Ascertainment.* Common to renewal applicants in both the radio and TV aspects of educational service, we believe, is the desirability of continuous ascertainment. *Further Notice*, Docket 19816, *supra*, and *First Report and Order*, Docket 19715, *supra*. We have received no comments here to alter that view. On the other hand, there are situations in which proximity of the ascertainment to the filing of the pertinent application is important. Thus, as is the case in the commercial field, noncommercial applicants for construction permits for new stations, for major changes in facilities,⁹ or for assignment or transfer of license¹⁰ shall be required to survey their respective communities within six months prior to the filing of those applications.

37. *Radio Methods.* For the reasons set out at Para. 34, *supra*, we shall permit noncommercial educational radio applicants and existing licensees to ascertain by any reasonable methods designed to provide them with an understanding of the problems, needs and interests of their service areas. This process is to be documented by a narrative statement regarding the sources consulted, the survey methods followed and the principal needs and interests discovered. Additionally, educational radio renewal applicants are to complete an annual list of up to 10 problems found in the community during the preceding 12 months, together with examples of programs broadcast to meet these problems. For new applicants, including assignees, the list of programs would be prospective. [Appendix A, Section 1.527(a) (7)] The narrative statement and the problems-programs list are to be maintained in the station's public file, and submitted to the Commission with the pertinent license application.

38. *Television.* Because of the result reached for radio here, we shall discuss in this section the bulk of the formal proposals in the *Further Notice*. The first step in the ascertainment process for both new and renewal television applicants is to compile and place in their public files demographic data on the community of license.¹¹ Such data shall

⁹ Applicants for construction permits for changes in authorized facilities will be required to ascertain their communities of license and service areas when the station's proposed field intensity contours (Grade B for television, 1 mV/m for FM, or 0.5 mV/m for AM) encompass a new area that is equal to or greater than 50 percent of the area within the authorized field intensity contours. Only the additional areas to be served need be ascertained when the applicant has previously ascertained or is continuously ascertaining its service area.

¹⁰ Except in *pro forma* cases where Form 316 is applicable.

¹¹ This requirement recognizes the availability of population data by community which usually is not measurable by "service area." We intend no change in the 1971 *Primer*, as interpreted, under which ascertainment beyond the community of license may be accomplished solely through the leader survey. 27 FCC 2d 650, Q. and A. 7 (1971); see also discussion of modification of Q. and A. 17 on petition for reconsideration, 33 FCC 2d 394 (1972); and *Ken Stephens*, 53 FCC 2d 389 (1975).

consist of information relating to the total population of the station's community, including the numbers and proportions of males and females, of minorities, of youth (17 and under), and of older persons (65 and above). This data will assist the licensee in its use of the Community Leader Checklist and in its survey of the public. The data may be obtained from the U.S. Census Bureau or other similarly reliable source.

39. As to the selection of community leaders in a fashion that will represent the community, we believe that the Checklist proposed in the *Further Notice* in this docket—and, again, actually adopted for triennial filing in Docket 19715 for commercial renewals—is sufficiently comprehensive to embrace not only those cultural and "life-enriching" interests which CPB sees as the special province of educational broadcasting (Para. 12, *supra*) but also those traditional sources of opinion about problems and needs that no broadcaster wishing to serve its community should ignore. Whether a Checklist would tend to reflect majority preferences is not relevant. We are not suggesting that licensees program only to those needs that receive the greatest Checklist response. Ascertainment is merely a vehicle for determining the problems, needs, and interests of the licensee's service area. The licensee, of course, has broad discretion in determining which needs it proposes to serve. We specifically have considered requests that we add the elements "media" and "handicapped" to the Checklist. We shall decline to do so. These groups may qualify as significant in some cities, and even be subsumable under elements presently found on the Checklist. In any event, a licensee has the option of adding them if warranted. In a related matter, Temple University suggested that we permit programming material presented on subsidiary Communications Authorizations (SCA), (See 47 C.F.R. § 73.593 *et seq.*) to qualify as meeting local needs. We recognize that such offerings often greatly assist the visually handicapped.¹² They are presently authorized, however, only as ancillary to the main broadcast service, and thus ought not be mingled in our evaluation of the main service.

Numbers

40. We believe it advisable here, as it was in Docket 19715 on commercial renewal ascertainment, to retreat from the proposal of minimum numbers of community leaders per Checklist element. We stated in the *First Report and Order*, 41 Fed. Reg. 1372, at Para. 25:

The comments received here have caused us to reconsider as well-intentioned but unwise our efforts to place a floor under the numbers of community leaders to be consulted. We sought to introduce a measure of predict-

¹² These services ordinarily provide local news; readings from local newspapers, current best sellers, and current periodicals; and information related to new developments of interest to the visually handicapped. These services, and the required specialized reception equipment, are ordinarily made available to the visually handicapped at no charge.

ability concerning ascertainment's quantitative aspects—a certain stability of expectation which would benefit both broadcasters and their citizen-evaluators. The magnitude and diversity of critical comment this inspired leads us to doubt the benefit in any change from the *Primer's* focus on a community leader ascertainment representative of all "significant elements" in the community—without reference to any set number or formula.

41. The "representativeness" we seek goes to the significance in the licensee's service area of the groups covered by the Checklist. Therefore, we do not seek a precise apportionment of interviews with women and minorities in relation to their numerical strength in the service area. If women as women—or women's groups as such—are significant, they should be represented in the survey; and the same is true of minority individuals and groups. How these persons are distributed among community elements obviously will vary widely from city to city.

LEVEL OF INTERVIEWS

42. The *Further Notice* proposed that all community leader consultations be conducted by principals and management-level employees when the application in question was other than renewal. For renewal applications, where licensees already are serving an area—and where principals and management presumably have been in contact with community leaders—we proposed allowing up to 50 percent of the interviews to be conducted by nonmanagement employees or volunteers. As indicated by Para. 37, *supra*, the question is mooted for radio stations, whose methodology is required only to be "reasonable." For educational television stations, we are inclined to believe that the 100%-management and 50%-management apportionment of community leader interviewing for new and renewal applicants respectively is workable, as suggested by the *Further Notice*. Although sympathetic to the importance of volunteers, we do not wish to be drawn into debates over whether a particular volunteer is operating at management level or below. Accordingly, no volunteer should be considered "principal" or "manager" for purposes of ascertainment interviewing. Volunteers may be utilized, however, wherever nonmanagement interviewing is permitted.

INTERVIEW FORMATS

43. Our *Further Notice* proposed that noncommercial licensees be afforded considerable flexibility in planning their leader surveys, and that we would accept a broad range of methods for leader interviews, to include group meetings, on-the-air interviews, town hall settings, chance encounters, telephone interviews, etc. We encouraged noncommercial applicants to experiment with a variety of methods. We shall adopt the proposals of the *Further Notice*, with caveats that interviews generally should be open-ended in order to assure that the response is not dictated by the form of the inquiry, if joint licensee or leader interviews are used, each community leader should be

given an opportunity to freely express his views on community problems, and each broadcaster present must have an opportunity to question each leader. *Southern California Broadcasting Association, Inc.*, 30 FCC 2d 705 (1971). Telephone interviews should be documented, if possible, with contemporaneous notes or follow-up letters. If, after pursuing its chosen methods, the licensee fails to develop adequate information on the problems and needs of his community, he should pursue other methods until his goal has been achieved.

44. Within a reasonable time after completion of an interview with a community leader—which we perceive ordinarily to be no more than 45 days—these licensees must place in their files a leader contact form. (See sample, Appendix E). These forms shall include the name of the leader interviewed, the organization represented, the interviewee's position of leadership; the date, time and place of the interview; the problems and needs disclosed; the name of the interviewer, and the interviewer's supervisor, if any; and finally, the date of review of the record of consultation by a principal or manager of the licensee.

GENERAL PUBLIC SURVEY

45. The overwhelming support from diverse sources for use of optional forms of contact with the general public persuades us that we should permit considerable variation and experimentation by existing licensees. On the other hand, we believe that new applicants, purchasers and others acquiring or adding to an audience in a given community for the first time, not having established the listener rapport contemplated by the alternatives set out below, should utilize the roughly random survey of the general public which has developed under the 1971 *Primer*. For renewal applicants who choose this traditional method, it may be performed at a single time during the license term, or throughout the period if randomness can be approximated thereby. For renewal applicants who choose this traditional method it may be performed at a single time during the license term, or throughout the period if randomness can be approximated thereby.* As has been noted earlier, applicants other than renewal—for whom the random sampling is required—will conduct their surveys within six months prior to filing the pertinent application.

46. Renewal applicants also may seek the views of the general public through periodic call-in programs or public meetings—the frequency to be a reasonable function of continuity—or some combination of these two basic methods. We stress that these may be treated as genuine "record" alternatives, and not merely as supplements to the traditional random sampling. We acknowledge that these optional methods are likely to produce a "response bias," and may tend to

elicit a great volume of program preferences along with opinions about community problems and needs. We believe, however, that through its familiarity with the problems and needs mentioned by community leaders, the licensee will be able to place the responses from the public in an overall ascertainment context, and to take any response bias into consideration in programming to meet the needs of the whole public. Moreover, we believe that licensees will be able to sort out program preferences from problems, needs and interests, and make appropriate use of the several type of information in attempting to serve the public interest.

47. The *Further Notice* proposed to allow the random-sample general public survey to be conducted by principals, employees, volunteers, or a professional research group. We shall adopt that proposal with the caveat that volunteers—standing in the shoes of non-management employees for this purpose—should be closely supervised by principals or managers. As for the call-in programs and public meeting options discussed above, we see no reason why volunteers, again properly supervised, could not take part. We are inclined to limit the use of professional research firms, however, to their traditional role in random sampling of the general public. The optional methods, we believe, posit a directness of involvement between station staff and public which would be diminished by the intervention of an outside contractor. Within a reasonable time after completion of the public survey, or any discrete portion of a survey, by any of the methods discussed above, the licensee shall place in its public file a brief narrative statement covering the techniques and results of that survey. These narrative statements shall be submitted to the Commission with the licensee's renewal application.

PROBLEMS-PROGRAMS LIST

48. All non-exempt¹³ licensees, radio and television alike, are required to deposit yearly in their public files a list of up to 10 significant problems and needs existing in their service area during the preceding 12 months, and a related list of illustrative programming presented during that period to treat those problems and needs. This list should demonstrate the link between each specific problem and the illustrative program meeting it. Placement in the station file should occur on the anniversary date of the filing of the renewal application, and, upon sending of that application to the Commission, all such annual problems-programs lists from the term about to expire should be transmitted with it. The requirement also applies to ascertainment in support of applications other than renewal, in which cases the lists of problems would be derived from the six-month pre-filing surveys and the

*This may be accomplished, for example, by initially selecting a random group and contacting all members of this group, a few at a time, throughout the license term.

¹³ Exempt licensees include those offering wholly instructional programming and those operating under Class D, 10-watt authorizations. See paras. 49 and 50, *infra*.

programs should be prospective offerings over the initial term of the license.

49 Instructional Programming. Our review of the comments received on the proposal to exempt instructional programming from ascertainment requirements indicates some misunderstanding. We proposed to exempt all programming characterized as "in-school," "in-service" or "for credit."⁴⁸ This exemption relates back to the inception of the educational broadcast service as an adjunct to university and school teaching facilities. Thus, while it may be true that an in-school credit course in advanced chemistry incidentally provides a service to the general public in understanding some aspect of environmental pollution, we do not propose to place on the broadcaster the burden of curriculum-building. This is for the academic institution sponsoring the in-school programs to decide, on behalf of its students. Naturally, ascertainments may turn up such problems as high illiteracy rates, racial tension, malnutrition, failure of the poor and elderly to make full use of governmental benefits, etc. Licensees who elect to treat such problems may do so, for example, by documentary, general educational or formal instructional programming. Thus, we do not mean to remove from ascertainment the discovery of certain needs merely because programming to them could be instructional, at the licensee's option. If, however, a licensee has chosen to program wholly "in-school" matter, then the selection of that material is beyond the pale of ascertainment, and such surveying will not be required.

50. 10-watt Stations. The comments filed in this proceeding, on balance, lead us at this time to exempt 10-watt stations from any obligation to ascertain the needs and interests of their service areas or the institutions to which they are licensed. As we indicated in the *Further Notice*, the average 10-watt station places a city grade signal (3.16 mV/m) only about one mile. Only in rare instances will such a station's effective radiated power place a 1 mV/m signal out beyond five miles. Further consideration will be given in Docket No. 14185 to the contention that these facilities result in inefficient use of the spectrum by blocking the possible implementation of higher power stations to serve larger portions of their communities. See *Revision of Broadcast Rules*, 5 FCC 2d 587 (1966). Also, we have received a petition for rulemaking from CPB (RM-1974) requesting amendments to our noncommercial FM broadcast rules that would affect 10-watt licensing.

51. State Networks. In proposing to hold state network licensees to local

ascertainment in each community where a station is licensed, we relied on "the local service policy which underlies our allocation of frequencies. We feel that state networks must conduct their ascertainment efforts so as to make contact with both leaders and the general public at the local level." *Further Notice, supra* at 780. We believe the argument for statewide-only ascertainment made by these network licensees—i.e., that educational channel assignments were expressly designed to provide statewide coverage of at least one educational broadcast "umbrella"—was not intended to, nor did it, defeat the concept of local service. The provision of a statewide reception service is not inconsistent with the existence of—or a potential for—local transmission services. We therefore shall require state networks to conduct a local ascertainment for each of their licensed stations having the capability to originate programming.⁴⁹ We note that the general public survey options (Para. 46, *supra*) may provide a measure of relief to these licensees. Also, in view of the unique staffing arrangements that exist at these stations, we believe that extraordinary use of the telephone in leadership surveys could be justified.

52. Small Market Exemption. Our review of the comments leads us to conclude that greater flexibility in the methods of ascertainment required for noncommercial educational licensees—which we believe is provided here, especially for radio—is more appropriate than an exemption based upon size of the community of license. Initially, we note that the selection of location for these facilities is usually made on the basis of considerations different from those of commercial licensees, who support their operations by the sale of commercial time. (See paragraphs 25–28, *supra*). The location of an educational station typically is dictated by the location of its affiliated educational institution. We suggest that stations licensed to educational institutions, and operated in large measure by transient students, may lack the continuity of community relationships and other-than-campus involvement which the small-town commercial licensee generally gains by virtue of its extended presence at the station and the personal involvement of its principals in functions that often would be delegated to employees of commercial stations in larger communities. Thus, we believe there is sufficient distinction between the usual situations of the commercial and noncommercial licensee in a smaller market to warrant an ascertainment exemption for the commercial station—as accomplished by the *First Report and Order* in Docket 19715, *supra*—while withdrawing from such an exemption for the noncommercial educational station.

CONCLUSION

53. The above represents the Commission's view regarding ascertainment of community needs by noncommercial broadcast applicants. Effectuating pro-

visions have been added as new § 1.527 of our rules. Such new forms as are required are adopted, subject to approval of the General Accounting Office. (Appendix C and D). Section 1.527 of the rules will become effective May 3, 1976, for all licensees whose authorizations expire August 1, 1977, and thereafter. Licensees may begin ascertaining the needs and interests of their communities on the effective date noted above. The first date on which any noncommercial educational licensee need include in its public file—or, where required, file with the Commission—a problems-programs list, a Community Leader Checklist, or an ascertainment narrative statement (radio only), is April 1, 1977, which is the date for submission of renewal applications by licensees whose terms expire August 1, 1977—the first renewal group to actually file under the new procedures. Applicants other than for renewal of license must comply with Section 1.527 if their applications are filed on April 1, 1977 or thereafter.

54. Accordingly, it is ordered, pursuant to the authority contained in Sections 4(i) and 303 of the Communications Act of 1934, as amended, That subject to General Accounting Office approval, FCC Forms 340 and 342 are amended as set forth below, and the Commission's rules, as amended, by amendment of Section 1.526 and addition of Section 1.527, as set forth below, effective May 3, 1976 for all applicants for existing, new or modified noncommercial educational facilities.

55. It is further ordered, That this proceeding is terminated.

Adopted: March 11, 1976.

Released: March 22, 1976.

(Secs. 4, 303, 48 Stat., as amended, 1066, 1082; 47 U.S.C. 154, 303)

FEDERAL COMMUNICATIONS
COMMISSION,*

[SEAL] VINCENT J. MULLINS,
Secretary.

1. Section 1.526 is amended by addition of the word "commercial" in the heading and its deletion in paragraph (a) as follows:

§ 1.526 Records to be maintained locally for public inspection by commercial applicants, permittees and licensees.

(a) *Records to be maintained.* Every applicant for a construction permit for a new station in the broadcast services shall maintain for public inspection a file for such station containing the material in subparagraph (1) of this paragraph, every permittee or licensee of a station in the broadcast services shall maintain for public inspection a file for such station containing the material in subparagraph (1), (2), (3), (4), (5), (6), (7) and (9) of this paragraph, and every permittee or licensee of a television station shall maintain for public inspection a file for such station containing the ma-

⁴⁸ Instructional programming is defined in noncommercial broadcast form 342 as follows:

Instructional (I) includes all programs designed to be utilized by any level of educational institution in the regular instructional program of the institution. In-school, in-service for teachers, and college credit courses are examples of instructional programs. (emphasis added)

⁴⁹ Ascertainment requirements did not apply to translator facilities.

*Statements of Commissioners Hooks and Robinson filed as part of the original document.

terial in subparagraph (8) of this paragraph: *Provided, however*, That the foregoing requirements shall not apply to applicants for or permittees or licensees of television broadcast translator stations, FM broadcast translator stations, or FM broadcast booster stations. The material to be contained in the file is as follows:

2. Section 1.527 is added new to read as follows:

§ 1.527 Records to be maintained locally for public inspection by noncommercial educational applicants, permittees, and licensees.

(a) *Records to be maintained by all applicants, permittees and licensees.* Every applicant for a construction permit for a new station in the noncommercial educational broadcast services shall maintain for public inspection a file for such stations containing the material in subparagraphs (1) and (7) of this paragraph. Every permittee or licensee of a station in the broadcast services shall maintain for public inspection a file for such station containing the material in all subparagraphs of this paragraph. *Provided, however*, that the foregoing requirements shall not apply to applicants for, or permittees or licensees of, television broadcast translator stations, or FM broadcast booster stations. The material to be contained in this file is as follows:

(1) A copy of every application tendered for filing by the applicant for such station after May 13, 1965, pursuant to the provisions of this part, with respect to which local public notice is required to be given under the provisions of § 1.580 or § 1.594; and all exhibits, letters and other documents tendered for filing as part thereof, all amendments thereto, copies of all documents incorporated therein by reference, all correspondence between the Commission and the applicant pertaining to the application after it has been tendered for filing, and copies of Initial Decisions and Final Decisions in hearing cases pertaining thereto, which according to the provisions of §§ 0.451-0.461 of this chapter are open for public inspection at the offices of the Commission. Information incorporated by reference which is already in the local file need not be duplicated if the entry making the reference sufficiently identifies the information so that it may be found in the file, and if there has been no change in the document since the date of filing and the applicant, after making the reference, so states. If petitions to deny are filed against the application, and have been duly served on the applicant, a statement that such a petition has been filed shall appear in the local file together with the name and address of the party filing the petition.

NOTE: Applications tendered for filing on or before May 13, 1965, which are designated for hearing after May 13, 1965, with local notice being given pursuant to the provisions of § 1.594, and material related to such applications, need not be placed in the file required to be kept by this section. Materials tendered for filing after May 13, 1965, which contain major amendments to applications

tendered for filing on or before May 13, 1965, with local notice of the amending application being given pursuant to the provisions of § 1.580, need not be placed in the file required to be kept by this section.

(2) A copy of every application tendered for filing by the licensee or permittee for such station after May 13, 1965, pursuant to the provisions of this part, which is not included in subparagraph (1) of this paragraph and which involves changes in program service, which requests an extension of time in which to complete construction of a new station, or which requests consent to involuntary assignment or transfer, or to voluntary assignment or transfer not resulting in a substantial change in ownership or control and which may be applied for on FCC Form 316; and copies of all exhibits, letters, and other documents filed as part thereof, all amendments thereto, all correspondence between the Commission and the applicant pertaining to the application after it has been tendered for filing, and copies of all documents incorporated therein by reference, which according to the provisions of §§ 0.451-0.461 of this chapter are open for public inspection at the offices of the Commission. Information incorporated by reference which is already in the local file need not be duplicated if the entry making the reference sufficiently identifies the information so that it may be found in the file, and there has been no change in the document since the date of filing and the licensee, after making the reference so states. If petitions to deny are filed against the application, and have been duly served on the applicant, a statement that such a petition has been filed shall appear in the local file together with the name and address of the party filing the petition.

(3) A copy of contracts listed in ownership reports filed in accordance with the provisions of § 1.615(e) (i) and which according to the provisions of §§ 0.451-0.461 of this chapter are open for public inspection at the offices of the Commission. Information incorporated by reference which is already in the local file need not be duplicated if the entry making the reference sufficiently identifies the information so that it may be found in the file, and if there has been no change in the document since the date of filing and the licensee or permittee, after making the reference, so states.

(4) Such records as are required to be kept by §§ 73.120(d), 73.590(d), and 73.657(d) of this chapter, concerning broadcasts by candidates for public office.

(5) A copy of every annual employment report filed by the licensee or permittee for such station pursuant to the provisions of this part; and copies of all exhibits, letters and other documents filed as part thereof, all amendments thereto, all correspondence between the permittee or licensee and the Commission pertaining to the reports after they have been filed and all documents incorporated therein by reference and which according to the provisions of §§ 0.451-0.461 of this chapter are open for

public inspection at the offices of the Commission.

(6) The Public and Broadcasting; Revised Edition (see FCC 74-942, 39 FR 32288, September 5, 1974).

(7) Problems-programs lists, as follows:

(i) Every year, on the anniversary date on which the station's renewal application would be due for filing with the Commission, each non-exempt renewal applicant shall place in its public inspection file a listing of no more than ten significant problems and needs of the area served by the station during the preceding twelve months. In relation to each problem or need cited, licensees and permittees shall indicate typical and illustrative programs or program series, excluding ordinary news inserts of breaking events, which were broadcast during the preceding twelve months in response to those problems and needs. Such a listing shall include the title of the program or program series, its source, type, brief description, time broadcast and duration. Renewal applicants shall place the third annual listing in the station's public inspection file on the due date of the filing of the station's application for renewal of license. Upon the filing of the station's application for renewal of license, the three annual problems-programs listings shall be forwarded to the Commission as part of the application for renewal of license. The annual listings are not to exceed five pages each, but may be supplemented at any time by additional material placed in the public inspection file and identified as a continuation of the information submitted to the Commission.

(ii) A non-exempt applicant for other than renewal of license shall submit to the Commission as part of its application, and place in its public inspection file, a listing of no more than ten significant problems and needs of the area proposed to be served during the initial license term to be covered by the application. In relation to each problem or need cited, such applicants shall indicate typical and illustrative programs or program series, excluding ordinary news inserts of breaking events, which are proposed for broadcast during the initial license term, in response to those problems and needs. This listing shall include the title of the proposed program or program series (if available), its source, type, a brief description, proposed time of broadcast and duration.

NOTE 1: The engineering section of the applications mentioned in subparagraphs (1) and (2) of this paragraph, and material related to the engineering section, need not be kept in the file required to be maintained by this paragraph. If such engineering section contains service contour maps submitted with that section, copies of such maps, and information (state, county, city, street address, or other identifying information) showing main studio and transmitter location shall be kept in the file.

NOTE 2: For purposes of paragraphs (a) (7) and (b) and (c) of this section exempt applicants, permittees or licensees include those whose existing or prospective facilities are Class D FM stations ("10-watt") under

Section 73.504(b)(1) or whose programming is wholly "Instructional" within the meaning of the instruction in Section IV of Forms 340 and 342 and the Report and Order in *Ascertainment of Community Problems by Noncommercial Broadcast Applicants*, 40 FR 12424, March 25, 1976, at para. 49.

(b) *Records to be maintained by non-exempt applicants, permittees, and licensees in the noncommercial educational radio service.* In addition to the requirements set out in paragraph (a) of this section, each radio applicant, permittee and licensee in the noncommercial educational radio service shall place in its public inspection file at such time as its renewal application would ordinarily be filed with the Commission—or in the case of applicants other than for renewal of license, at the time the application is filed—a narrative statement detailing the sources consulted and the methods followed in conducting its ascertainment of community needs and interests and summarizing principal needs and interests discovered through that survey. These items shall also be filed with the Commission as a part of the licensee's application.

(c) *Records to be maintained by applicants, permittees, and licensees in the noncommercial educational television service.* In addition to the requirements set out in paragraph (a) of this section, each applicant, permittee, and licensee in the noncommercial educational television service that is required to maintain a public file under paragraph (a) of this section shall maintain the following in its public inspection file:

(1) Appropriate documentation relating to its efforts to interview a representative cross-section of community leaders in its service area to ascertain its problems and needs. Such documentation shall be placed in the station's public inspection file within a reasonable time after the date of completion of each interview, but in no event later than the due date for filing the station's application for renewal of license, and shall include: (a) the name, address, organization, and position or title of the community leader interviewed; (b) the date, time and place of the interview; (c) the name of the principal, permittee-level or other employee or volunteer conducting the interview; (d) the problems and needs discussed during the interview or when the interviewee requests that his/her statements be held in confidence, that request shall be noted; and (e) for interviews conducted by non-principals or non-managers the date of review of the interview record by a principal or management-level employee. Additionally, upon the filing of the application for renewal of license each licensee shall forward to the Commission as part of the application for renewal of license and each licensee and permittee shall place in the station's public inspection file, a checklist indicating the number of community leaders interviewed during the current license term representing elements found on the sample Community Leader Checklist (see *Ascertainment of Community Problems by Broadcast Rel-*

new Applicants, 41 FR 1372, 1384 (1976)); provided that, if a community lacks one of the enumerated institutions or elements, the licensee and permittee should so indicate by providing a brief explanation on its checklist. The same rules apply to applicants for other than renewal of license except that the checklist for an ascertainment of community leaders shall reflect information obtained within six months prior to filing and shall be placed in the public file no later than the time the application is filed.

(2) Documentation relating to its efforts to consult with members of the public to ascertain community problems and needs. Such documentation shall consist of:

(i) Information relating to the total population of the station's community of license, including the numbers and proportions of males and females; of minorities; of youth (17 and under); and the numbers and proportions of the elderly (65 and over); and

(ii) Information regarding the public survey. An applicant for other than renewal of license shall conduct a random survey of the general public in its community of license within six months prior to filing its application, and shall file the information requested in subparagraph (A) below. Applicants for renewal of license may, at their option, conduct a random general public survey, periodic call-in programs, periodic public meetings or a combination of the latter two methods. Licensees should file information describing the methods used as set out in subparagraphs (A), (B), and (C), as a part of their renewal applications:

(A) If a random general public survey is conducted, a narrative statement, not to exceed five pages in length, of the sources consulted and the methods followed in conducting the general public survey, including the number of people surveyed and the results thereof;

(B) If a periodic call-in program is used, a narrative statement for each such program describing the numbers of persons reached, the duration of the program(s), the manner in which notice of the airing of the program was given to the public, the issues discussed and other relevant descriptive material; and

(C) If periodic public meetings are used, a narrative statement for each such meeting describing the time and place of the meeting, the approximate number of persons present and speaking, the duration of the meeting, the manner in which notice of the meeting was given to the public, the issues discussed, the names and titles of station representatives present and other relative descriptive material.

The information requested in subparagraphs (A), (B) and (C) above shall be placed in the public inspection file within a reasonable time after completion of the public ascertainment—or severable portion thereof, such as each call-in program or public meeting—but in no event later than the due date for filing the application, and shall be filed with the Commission as a part of the renewal application. The demographic

information requested in (i) above shall be deposited in the public file no later than the time at which the information called for by (ii), or some portion thereof, is deposited.

(3) Although not part of the regular file for public inspection, program logs for television stations will be available for public inspection under the circumstances set forth in § 73.674 and discussed in the Public and Broadcasting; Revised Edition.

(d) *Responsibility in case of assignment or transfer.* (1) In cases involving applications for consent to assignment of broadcast station construction permits or licenses, with respect to which public notice is required to be given under the provisions of § 1.580 or § 1.594, the file mentioned in paragraph (a) of this section shall be maintained by the assignor. If the assignment is consented to by the Commission, and consummated, the assignee shall maintain the file commencing with the date on which notice of the consummation of the assignment is filed with the Commission. The file maintained by the assignee shall cover the period both before and after the time when the notice of consummation of assignment was filed. The assignee is responsible for obtaining copies of the necessary documents from the assignor or from the Commission files.

(2) In cases involving applications for consent to transfer of control of a permittee or licensee of a broadcast station, the file mentioned in paragraph (a) of this section shall be maintained by the permittee or licensee.

(e) *Station to which records pertain.* The file need contain only applications, ownership reports, and related material that concern the station for which the file is kept. Applicants, permittees, and licensees need not keep in the file copies of such applications, reports, and material which pertain to other stations with regard to which they may be applicants, permittees, or licensees, except to the extent that such information is reflected in the materials required to be kept under the provisions of this section.

(f) *Location of records.* The file shall be maintained at the main studio of the station, or at any accessible place (such as a public registry for documents or an attorney's office) in the community to which the station is or is proposed to be licensed, and shall be available for public inspection at any time during regular business hours.

(g) *Period of retention.* The records specified in paragraph (a)(4) of this section shall be retained for the periods specified in §§ 73.120(d), 73.590(d) and 73.657(d) of this chapter. The manual specified in paragraph (a)(6) of this section shall be retained indefinitely. The records specified in paragraphs (a)(1), (2), (3), (5), (7); (b); and (c) of this section shall be retained as follows:

(1) The applicant for a construction permit for a new station shall maintain such a file so long as the proceeding in which that application was filed is pending before the Commission or any proceeding involving that application is

pending before the courts. (If the application is granted, subparagraph (2) of this paragraph shall apply.)

(2) The permittee or licensee shall maintain such a file so long as an authorization to operate the station is outstanding, and shall permit public inspection of the material as long as it is retained by the licensee even though the request for inspection is made after the conclusion of the required retention period specified in this subparagraph. However, material which is voluntarily retained after the required retention time may be kept in a form and place convenient to the licensee, and shall be made available to the inquiring party, in good faith after written request, at a time and place convenient to both the party and the licensee. Applications and other material placed in the file shall be retained for a period of 7 years from the date the material is tendered for filing with the Commission, with two exceptions: First, engineering material pertaining to a former mode of operation need not be retained longer than 3 years after a station commences operation under a mode; and second, all of the material shall be retained for whatever longer period is necessary to comply with the following requirements: (i) Material shall be retained until final Commission action on the second renewal application following the application or other material in question; and (ii) material having a substantial bearing on a matter which is the subject of a claim against the licensee, or relating to a Commission investigation or a complaint to the Commission of which the licensee has been advised, shall be retained until the licensee is notified in writing that the material may be discarded, or, if the matter is a private one, the claim has been satisfied or is barred by statutes of limitations. Where an application or related material incorporates by reference material in earlier application and material concerning programming and related matters (section IV and related material), the material so referred to shall be retained as long as the application referring to it.

(h) Copies of any material in the public file of any television station shall be available for machine reproduction upon request made in person, provided the requesting party shall pay the reasonable cost of reproduction. Requests for machine copies shall be fulfilled at a location specified by the licensee, within a reasonable period of time, which in no event shall be longer than seven days. The licensee is not required to honor requests made by mail but may do so if it chooses.

APPENDIX B—PARTIES FILING COMMENTS

Advisory Council of National Organizations, Washington, D.C.
Alabama Educational Television Commission.
Alaska Public Television, Inc. (KAKM-TV), Anchorage, Alaska.
Arkansas State University Public Radio Service (KASU-FM), Jonesboro, Arkansas.
Association of Public Radio Stations (APRS).
Board of Education, Memphis City Schools (WQOX-FM), Memphis, Tennessee.
Board of Trustees of Vincennes University [WVUT (TV) and WVUB-FM], Vincennes, Indiana.
Charles E. Buzzard (General Manager, KMCR-FM), Phoenix, Arizona.
Clark County School District (KLTV-TV, Las Vegas, Nevada); Educational Broadcasting Corporation (WNET, Newark, New Jersey); and the University of Alaska (KUAC and KUAC-TV, Fairbanks, Alaska) (Joint Comments).
Committee for Community Access, Boston, Massachusetts.
Connecticut Educational Television Corporation, University of Illinois Board of Trustees, Central Michigan University, Lehigh Valley Educational Television Corporation, University of Maine, Regents of the University of Michigan, University of Nebraska, Nebraska Educational Television Commission, Northeastern Pennsylvania Educational Television Association, South Carolina Educational Television Network, South Central Educational Broadcasting Council, Virginia Public Telecommunications Council, Board of Regents of the University of Wisconsin System, and the State of Wisconsin—Educational Communications Board (Joint Comments).
Corporation for Public Broadcasting (CPB).
Department of Health, Education, and Welfare, Office for Civil Rights (HEW).
Georgia State Board of Education.
KLCS 58, Los Angeles City Schools, Los Angeles, California.
Maryland Center for Public Broadcasting.
Michigan State University.
Lorenzo W. Milam, Dallas, Texas.
National Association of Educational Broadcasters (NAEB).
National Citizens Committee for Broadcasting and National Black Media Coalition (Joint Comments) (NCCB-NBMC).
National Federation of Community Broadcasters, Inc.
New Jersey Coalition for Fair Broadcasting (Coalition).
Office of Communication of the United Church of Christ (UCC).
The President's Committee on Employment of the Handicapped.
John H. Schmidt, WBAU, Garden City, New York.
School System of Gary (WGVE-FM), Gary, Indiana.
South Dakota Public Television Network.
Southeastern Bible College, Birmingham, Alabama.
Southern Keswick, Inc., St. Petersburg, Florida (WKES, St. Petersburg, Florida; WGNB, Indian Rocks Beach, Florida).
Spring Arbor College Communications, Inc., and E. Harold Munn, Jr. (WSAE-FM), Spring Arbor, Michigan.

Temple University of the Commonwealth System of Higher Education (WRTI), Philadelphia, Pennsylvania.
University of Houston (KUHT, Houston; KLRN, Austin-San Antonio; KERA, Dallas-Fort Worth, Texas).
University of New Haven (WNHU), West Haven, Connecticut.
University of Northern Colorado (KUNC-FM), Greeley, Colorado.
West Virginia Wesleyan College (WVWC-FM), Buckhannon, West Virginia.
WPKN, Bridgeport, Connecticut.

APPENDIX C

1. FCC Form 340, Section IV is amended by the addition of the following questions:

6. State what percentage of the station's ordinary broadcast week will be devoted to instructional programming (see definition of instructional programming above).

7. Has the applicant placed in its public inspection file the required documentation relating to its efforts to ascertain community problems and needs? If "No", explain.

☐ Yes ☐ No

Radio applicants attach as Exhibit No. ---- the narrative description of this survey (as required by Section 1.527(b) of the Commission's Rules).

8. Has the applicant placed in its public inspection file the list of no more than 10 significant problems and needs which, in the applicant's judgment, warrant treatment during the coming term, and proposed typical and illustrative programming to be broadcast in response thereto?

☐ Yes ☐ No

Attach this listing as Exhibit No. ----
9. Television applicants attach as Exhibit No. ---- the Community Leader Checklist for your ascertainment effort conducted six months prior to filing.

2. FCC Form 342, Section IV is amended by addition of the following questions:

4. State what percentage of the station's programming was devoted to instructional programming during an ordinary week of the past license term.

5. Has the applicant placed in its public inspection file at the appropriate times the required documentation relating to its efforts to ascertain the community problems and needs?

☐ Yes ☐ No

Radio applicants attach as Exhibit No. ---- the narrative description of this survey (as required by Section 1.527(b) of the Commission's Rules).

Television applicants attach as Exhibit No. ---- the narrative description of the public survey (as required by Section 1.527(c)(2) of the Commission's Rules).

6. Television applicants attach as Exhibit No. ---- your Community Leader Checklist.

7. Has the applicant placed in its public inspection file at the appropriate times its annual lists of no more than 10 significant problems and needs which, in the applicant's judgment, warranted treatment by its station, together with the typical and illustrative programming broadcast in response thereto?

☐ Yes ☐ No

Attach those listings as Exhibit No. ----

RULES AND REGULATIONS

APPENDIX D.—Sample—community leaders checklist

Institution/element	Number	Not applicable (explain briefly)
1. Agriculture.....		
2. Business.....		
3. Charities.....		
4. Civic, neighborhood, and fraternal organizations.....		
5. Consumer services.....		
6. Culture.....		
7. Education.....		
8. Environment.....		
9. Government (local, county, State and Federal).....		
10. Labor.....		
11. Military.....		
12. Minority and ethnic groups.....		
13. Organizations of and for the elderly.....		
14. Organizations of and for women.....		
15. Organizations of and for youth (including children) and students.....		
16. Professions.....		
17. Public Safety, health, and welfare.....		
18. Recreation.....		
19. Religion.....		
20. Other.....		

While the following are not regarded as separate community elements for purposes of this survey, indicate the number of leaders interviewed in all elements above who are:

(a) Blacks.....	
(b) Hispanic, Spanish speaking, or Spanish-surnamed Americans.....	
(c) American Indians.....	
(d) Orientals.....	
(e) Women.....	

APPENDIX E—SUGGESTED LEADER CONTACT FORM

Date: _____

Name and address of person contacted: _____

Organization(s) or group(s) represented by person contacted: _____

Date, time and place of contact: _____

Method of contact: _____

Problems, needs and interests identified by person contacted: _____

Name of interviewer: _____

Reviewed by _____ Position _____

Date _____

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