

# UNITED CHURCH OF CHRIST OFFICE OF COMMUNICATION

000 M STREET, NW, 4TH FLOOR, WASHINGTON, D.C. 20036 TEL. (202) 331-4265

DR. BEVERLY J. CHAIN, Director

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**APR 29 1992**

April 29, 1992

Federal Communications Commission  
Office of the Secretary

Ms. Donna R. Searcy  
Secretary, Federal Communication  
Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

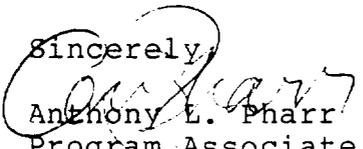
Dear Ms. Searcy,

Pursuant to Section 1.1206 of the Commission's Rules, please find enclosed a summarization of our oral ex parte presentation on April 29th to Commissioner Marshall. The presentation related to the following rule-makings:

CC Docket No. 87-266  
MM Docket No. 91-221  
MM Docket No. 91-140 /

Please contact me at the above telephone number, if there are any questions.

Sincerely,

  
Anthony L. Pharr  
Program Associate

enclosure

# UCC UNITED CHURCH OF CHRIST OFFICE OF COMMUNICATION

7000 M STREET, NW, 4TH FLOOR, WASHINGTON, D.C. 20036 TEL. (202) 331-4265

DR. BEVERLY J. CHAIN, Director

## SUMMARY OF POSITIONS OF THE OFFICE OF COMMUNICATION ON MATTERS PENDING BEFORE THE FCC APRIL 29 - MAY 1, 1992

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Federal Communications Commission  
Office of the Secretary

### I. Telco\cable cross-ownership

The telcos have unanimously argued that in order to cost-justify investment in a broadband video-dialtone network they must be permitted entry into programming services. Policy-makers should examine recent RBOC market tests which show that a feature rich video-dialtone service can be achieved without lifting the ban or deploying fiber-optic cable.

A. Rates for POTs service will increase dramatically if fiber is deployed prematurely to replace copper wire. Some experts estimate the cost of ubiquitous fiber-to-the-home in the range of \$100-1,000 billion. The Commission's Further Notice of Proposed Rulemaking neglects to address the important issue of how to allocate costs between advanced telecommunication services - the primary driving force for fiber deployment - and plain old voice service. OC/UCC urges the Commission to adopt cost allocation rules that will protect POTs users from absorbing any of the costs associated with premature network upgrades. The present Joint Cost Allocation Guidelines are ineffective in this regard. 1988 OC/UCC Telco\cable Reply Comments at 4.

B. Narrow-band ISDN is a near-term low-cost method for transmitting simultaneous voice, video and digital signals. Test trials planned by AT&T and Bell Atlantic utilizing ADSL, an advanced compression technology, will transmit VCR-quality video signals over twisted copper-pair wire without interfering with voice communication. It is estimated that 75 percent of all residential subscribers are within the range of central offices where compression technology equipment can be installed. Using the existing copper wire infrastructure, as opposed to fiber optic cable, can greatly reduce the cost of bringing video-dialtone to the marketplace. See attached material on ADSL.

C. Video-on-demand experiments have already begun at U.S. West, GTE, and Bell Atlantic. They have been successful in obtaining programming from cable TV companies and other programming sources. A Bell Atlantic executive recently stated that suppliers have responded enthusiastically to requests response for programming to stock a video-on-demand library with over 1000 movies.

- It is the policy of the Commission that it is the individual responsibility of each license to serve the needs of the their community. Nothing in the new rules, however, would prevent the transfer of control over programming under a brokerage arrangement. For example, under time-brokering all of the public interest programming of a brokered station could be supplied by the brokering station. OC/UCC Radio Reply Comments at 15 - 16.

- A requirement that a station merely reserve the legal right to exercise programming control is inadequate. In order for the public interest to be served, nothing less than an requirement to affirmatively exercise control is appropriate.

- The Commission's Report & Order has neglected to address the concerns that may be raised in petitions-to-deny. Will license renewal applications be approved despite citizen petitions that show that the entirety of a station's issue-responsive programming has been supplied by a station in another community? OC/UCC Radio Reply Comments at 17.

D. The new national ownership rules undermine the Commission's goal of protecting and promoting diversity of viewpoint.

- In support of its contention that diversity is enhanced by increased group-ownership the Commission relies upon outdated studies that are inadequate for measuring the effects of the Commission's multiple ownership rules. Report & Order at para. 21; OC/UCC Radio Comments at 3; OC/UCC Radio Reply Comments at 2.

- Other than self-serving comments supplied by the radio industry, the Commission lacks evidence to support its theory that group-owned stations make autonomous editorial decisions. Report & Order para. 22.

- The Report & Order overlooks recently compiled evidence that shows that most group-owned television stations do not have local news operations. This tends to undermine the Commission's theory that savings from economies of scale are re-invested into locally produced programming. OC/UCC Radio Comments at 4. OC/UCC Radio Reply Comments at 4 - 5.

- The often cited "explosive growth" in the number of media outlets, Report & Order para. 35, is offset by increased concentration of ownership over the past several years. OC/UCC Radio Reply Comments at 6 - 7.

E. Increased ownership caps will adversely affect minority ownership.

- Despite comments supplied by OC/UCC and the majority of minority ownership representatives, the Commission has neglected to take into consideration the inflationary affect that increased ownership caps in combination with repealed anti-trafficking rules will have upon

**ATTACHMENTS**

I. Telco\cable cross-ownership

- two background articles on video compression.

EARL E. MANCHESTER

The telecommunications industry is looking at a new capability that could extend the life of traditional copper loop plant facilities while bringing new service capabilities to customers who will not see fiber optics for some time to come.

Asymmetric digital subscriber line (ADSL) capability transports a DS1 bit stream (1.544 Mb/s) from the public telephone network to customers, without repeaters, while simultaneously providing a 16-kb/s control stream from the customer back to the network. Because of the marked difference in bit rate between the two directions of transmission, this capability is called asymmetric.

The ADSL concept grew out of Bellcore's developmental work for high-rate digital subscriber line. HDSL is a symmetric DS1 capability using two non-repeated copper pairs and is limited to a range of 12,000 feet from the central office. ADSL, on the other hand, has a design goal of 18,000 feet on just one copper pair.

Residential customers are likely to be the primary users of ADSL, since businesses typically need higher bit-rate services that are symmetric. Within the network, these ADSL circuits are connected to high bit-rate switches. Under customer control, ADSL circuits can support a variety of interesting potential services that will offer new revenue opportunities to local exchange carriers.

#### Potential Services

With any new network capability, it is important to identify several specific applications. Within ADSL's target residential market, transport is an issue, both in terms of delivery bandwidth and control signaling.

Possible services based on ADSL capabilities can be organized in three broad categories: data, audio and image services.

Within the data service realm, the ADSL line can terminate in computer-based or video-based equipment. Although the differences between the two are becoming less distinct, there are con-

## New uses for residential copper

*New transport technology will bring wideband services to the home on the existing copper network*

tinuing differences in the protocol of transmission to the customer and in the methods that the customer uses to respond.

The basic protocol requirement for computer-based equipment is the need to transmit and receive text characters and control sequences. Video-based equipment requires an analog video signal to paint the picture one line at a time. In addition, analog audio accompanies the picture information. This is accomplished using digital encoding and compression for both the picture and audio information.

Differences in the methods of control include the use of keyboards and mice in the computer environment vs. infrared remote controls and joysticks in the video equipment realm.

ADSL transport lends support to computer-based data services such as computer-aided design and manufacturing (CAD/CAM) and medical imaging. In such scenarios, the network provides fast

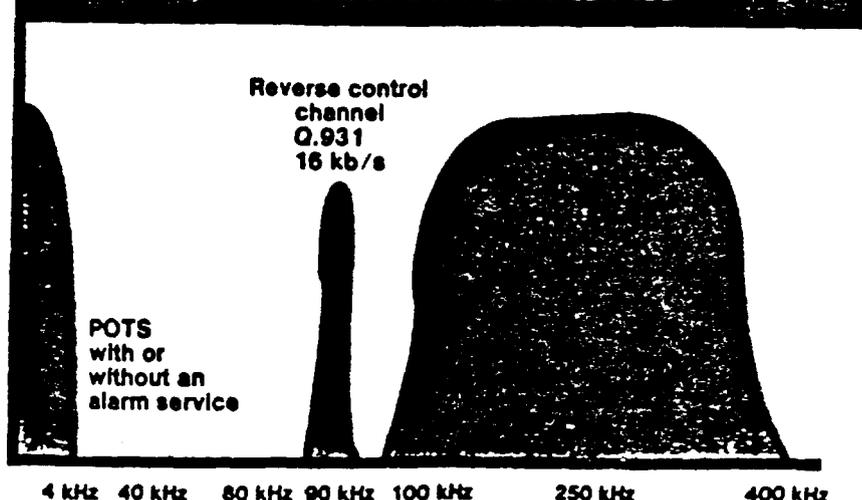
circuit setup and tear-down. Connections are controlled by the customer and information downloading is rapid. Then the network connection can be released. The computer can print or manipulate the data. Later the connection can be re-established, and changes can be transmitted to the same destination or another one.

Catalog browsing and shopping and research services are further examples of services that are bandwidth-intensive in the direction toward the customer, but that require little control information such as page turning and item selection going back to the source. These services could be accessed using either computer-based or video-based equipment.

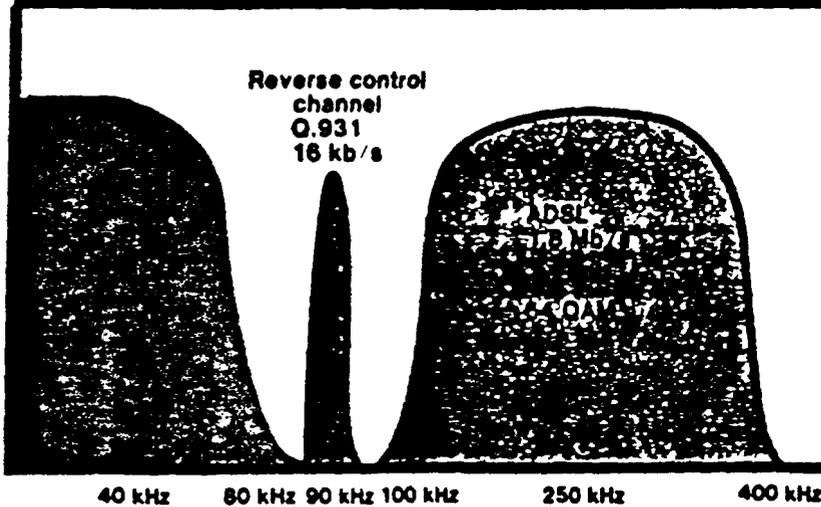
Digital audio services may be supported by ADSL transport in several different formats. One format could use the emerging Motion Picture Experts Group standard to transmit pictures with improved stereo audio. Cus-

*continued on page 28*

FIGURE 1 FREQUENCY DISTRIBUTION OF ADSL WORKING WITH POTS AND AN ALARM SERVICE



**FIGURE 2. FREQUENCY DISTRIBUTION OF ADSL WORKING WITH ISDN BASIC RATE**



**Residential Copper** *continued*  
 tomers will perceive this sound to be equal or better than FM broadcast material. In addition, the ADSL pipe is large enough to support a compact disc (CD) digital bit stream. In this arrangement, a CD digital signal requires about 1400 kb/s, leaving additional bandwidth for in-band error correction coding if needed. Customers could use it as an audio jukebox, requesting previews of newly released albums or lining up a session of prerecorded favorites.

Image services can draw heavily on the MPEG standard. The MPEG is completing work on an ISO standard that describes a compression scheme for entertainment video with stereo audio. The compressed digital signal will be carried within a DS1 facility. The full-motion color video is expected to have a quality approximately equal to a home entertainment VCR. The network can switch digitized, compressed video signals as ordered by the customer and deliver them over the ADSL transport.

**Entertainment to Education**

ADSL transport can be used for a variety of image and audio-based services that reach into the education, entertainment and home business realms.

Videoconferencing will be possible with computer workstations at



full-motion video and from which still frames can be transmitted back through the network.

Computer games are another application in which the customer receives elaborate screen displays or replacement game scenarios in response to the few keystrokes that travel back through the network. ADSL also could be used to provide interactive gaming, which allows one game to be played by many people at several locations.

ADSL also allows compressed video and audio to be provided upon request and gives customers control of material that goes beyond what is currently available on a typical home VCR. This material includes functions such as pause, fast forward, stop, rewind, camera angle and selection. Such an arrangement facilitates specialized training, medical and other uses such as home schooling.

**The Technology**

ADSL is basically a means to transport DS1 channels from the network to customers using non-loaded, twisted copper-pair facilities. The anticipated range of ADSL equipment using quadrature amplitude modulation (QAM) signals is from 0 feet to 18,000 feet. About 75% of residential telephone customers are served today on non-loaded facilities less than 18,000 feet from the CO.

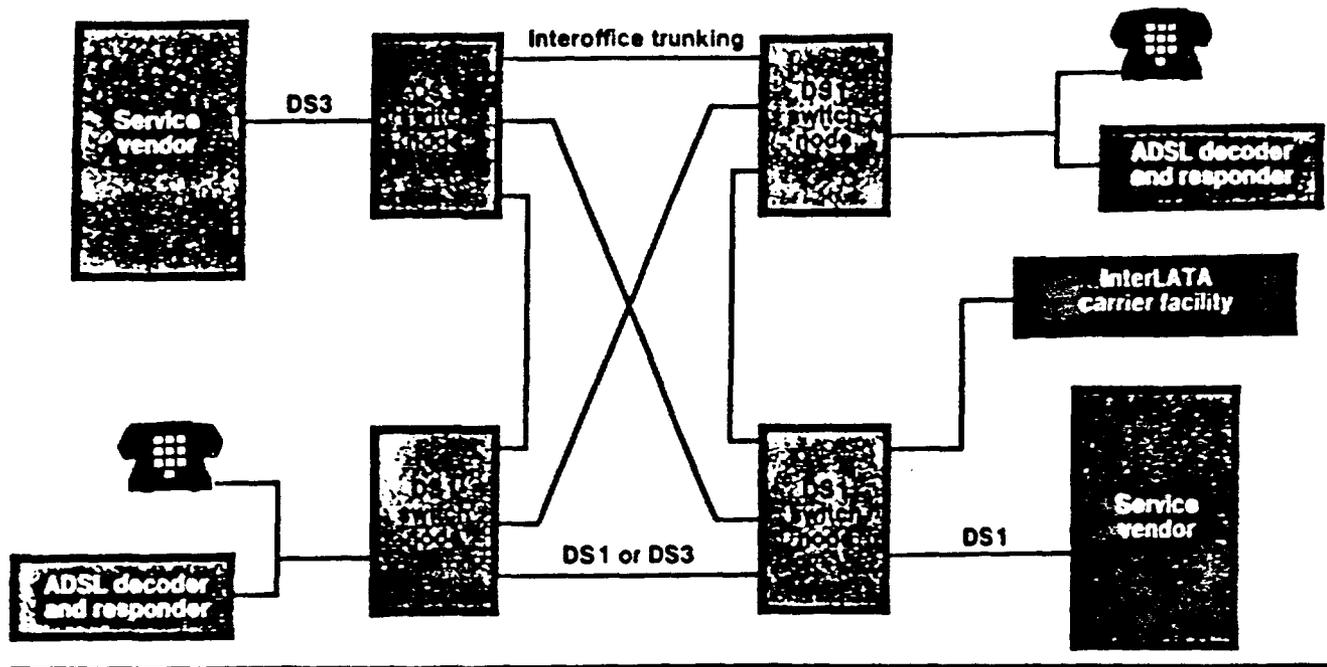
The customer's basic telephone service, carried on the same copper pair, is unaffected by the addition of ADSL. The two services are independent and transparent to each other even though they both use the same transmission facility.

One potential implementation of ADSL has a total derived digital line rate of about 1800 kb/s from the network to the customer. This derived line rate is slightly higher than the DS1 rate of 1.544 Mb/s, but it is used to carry the 1.544-Mb/s DS1 channel, a 16-kb/s control channel from the network to the customer, and about 10% overhead for forward error correction prior to QAM coding. This combined total then may be scrambled to improve density and framed to simplify the receiver design for signal recovery.

One possible scheme for modulating this 1800-kb/s digital stream is 64 QAM, which represents an encoding scheme that offers a 6-bit/hertz efficiency. By using 64 QAM the total bandwidth required would be 300 kHz (1800/6-300). Figures 1 and 2 show this bandwidth in a bandpass arrangement between 100 kHz and 400 kHz. These figures also show the associated reverse control channel, and basic service with or without alarm services. Figure 2 illustrates the 64 QAM signal with ISDN basic rate service.

A second proposed method would use 16 QAM, which because of its lower 4-bit/hertz efficiency requires a larger bandwidth of 450 kHz. More robust signal recovery is available at 16 QAM, but the larger bandwidth would require greater loss margin for the receive

FIGURE 3 SWITCHED DS1 LATA TRUNKING



**Residential Copper** *continued*  
 signal. In addition to bidirectional basic service and unidirectional DS1 capabilities, a reverse channel is required to carry data at about 16 kb/s.

It could be assigned at perhaps 90 kHz. In fact, this channel could use the Q.931 D channel protocol used in ISDN. The advantage of this strategy is that some of the issues for operations, maintenance and migration to future broadband services become much easier to address.

The data carried on this 16-kb/s channel can be categorized into three message sets covering performance, customer information including service requests, and service control signals.

The performance message will indicate whether the DS1 signal is being received by the customer equipment, whether the customer equipment has "framed" to this incoming signal, and the level of error performance. Here performance messages will constitute less than 1-kb/s data. In addition, it is anticipated that a performance message will be generated about once a second.

The second message set includes customer service requests, customer address information, service provider selections and item selections.

The third message set concerns service control signals. These signals will request actions concerning the DS1 stream content and are transmitted by the network back to the service provider. Included in the message set are flow control and such functions as VCR controls for start, stop, fast forward, rewind and pause.

Very large-scale integration chips are expected to be available for ADSL by 1994. New chips will be needed for both network COs and customer premises equipment. Customer equipment must



be inexpensive because overall service costs are very sensitive to CPE costs.

#### Network Architecture

Within the network, the ADSL line can terminate on an electronic switch that can interconnect asymmetric and symmetric DS1

together with interoffice DS1s and DS3s. Some of the control messages would be used within the switch for routing, charging and operations, administration and maintenance functions. The remaining control messages would be groomed and forwarded to the selected service provider. Figure 3 shows how these DS1/DS3 switches could be interconnected within a LATA.

Another unique feature of this new switch would be its ability to multicast one signal to many customers. For instance, if there is a live video event being transmitted, many customers could request connection to this event, and they all would receive a copy of the digital signal.

Most people agree that the majority of residential customers will not be served by fiber to the curb any time soon. Methods that can deliver larger bandwidths across existing copper facilities will fulfill customer requirements for high-speed services and will allow a graceful migration to the fiber world of the 21st century. ADSL is one method that can provide significant near- and longer-term benefits for customers and network providers. □

Earl E. Manchester is a Member of the Technical Staff at U S West Advanced Technologies, Boulder, Colo.

# Bell Atlantic, Nynex To Test Video-on-Demand

By FRED DAWSON

**B**ell Atlantic Corp. and Nynex Corp. are preparing to test new approaches to adding video to their service mixes, one involving video-on-demand, the other a mixed media package to businesses.

Bell Atlantic's new scheme involves testing delivery of VOD to about 100 employees starting at year's end, once the RBOC has satisfied itself that the new video-over-copper technology known as ADSL (asymmetrical digital subscriber line) is practical.

In the case of Nynex, the plan calls for exploring expansion of Dow Jones' information retrieval services to business users by adding video options in multimedia format.

Both companies stress that their efforts are preliminary and in no way represent a commitment to introduce services. But if the feasi-

bility in this phase, since the emphasis will be on technical rather than market performance, unlike cable VOD tests, which are marketing-driven.

In addition, the company will use ADSL to supply employees with training and other in-house information to test the viability of the technology for other applications, which could extend to virtually any type of digital service operating at

or below the 1.5 megabit per second (Mbit/sec) threshold.

Although AT&T Paradyne says it can tailor its technology to deliver in the range of 4 Mbit/sec over the full length of copper plant, Bell Atlantic has no plans to test this option right now, owing to the lack of channel-signaling gear for this level of digital service.

Another option at full capacity of the technology would be to sup-

ply two 1.5 Mbit/sec channels over a single line, which Bell Atlantic might explore in conjunction with this or other tests. The RBOC has already announced plans to use ADSL in a multimedia education experiment in New Jersey next year.

The VOD test will also employ high-capacity, high-speed data processing technology, which Konkle described as being the furthest

along toward implementation of the telco's use. This element addresses the storage, ordering and playback end of the VOD service.

Still at issue are such questions as the cost of decoders and A units, which permit transmission of the video signal along with standard voice as well as a return signal for ordering service. "We've done some prelim-

SEE BELL, PAGE 10

If the test results are promising, commercial deployment could begin by 1993.

ity tests prove promising, there's a good chance that they could move to commercial deployment by mid to late 1993.

According to Dan Konkle, a manager with technical responsibility for the VOD project at Bell Atlantic, the first step in the test was undertaken successfully at the RBOC's WAVE conference in Baltimore last month. There, a five-minute segment of the movie *Spartacus* was transmitted over a 7,000-foot, 26-gauge twisted-pair copper line using ADSL technology and video compression. The movie segment was shown on a 20-inch TV side by side with a VHS-generated picture.

Konkle said the technology will be pushed to its limits over the next few months in hopes of demonstrating that transmission quality will hold up over standard copper plant at distances up to 18,000 feet, which is the maximum run for telco loop lines.

For this phase of the test, Bell Atlantic has ordered three ADSL units from AT&T Paradyne and three compression decoders from C-Cube Microsystems, which makes chips based on the Motion Picture Experts Group (MPEG) protocols.

"Once we determine the technology performs satisfactorily over plant matched to existing loop characteristics, we'll equip up to 100 Bell Atlantic employees to receive service," Konkle said, adding that there has been no decision for the site of that test phase.

He indicated that there would probably be only a few movies of-

Repackaging was the smartest thing we've done in years

I know, I've seen

'92's going to be a great year

# Sikes Expects Telco Rules by Summer

By JEANNINE VIDELA

WASHINGTON — The Federal Communications Commission expects to issue new rules governing the relationship between telephone and cable companies by this summer, Chairman Alfred Sikes said last Thursday. The FCC is addressing those relationships in its Video Deal case, proceeding, which, among other things, would permit telephone companies to offer cable service on a non-carrier basis without a franchise. With the proposal due for advancing subcommittee legislation this year, Senate Majority

leader Robert Dole (R-Kan.) and Sen. Conrad Burns (R-Mont.), a sponsor of a tele-communications bill, have asked the White House to play a greater role in shaping the FCC's video deal case policy.

Sikes said he didn't expect any legislation of White House involvement in this area as a result of the Dole and Burns request. If the White House "develops a case of hardship" over the FCC's actions or agenda, "we'll hear about it," Sikes said. By year's end, the FCC hopes to wrap up other proceedings including spectrum allo-

ca for emerging technologies and to present a communications system (PCS), a very important blueprint for FCC spectrum allocation rules and programming rules for broadcast as they prepare for the completion of high-definition television, and whether two or more video should be allowed.

With procedural objections pending, Sikes wondered how fruitful the last quarter of the year will be in terms of policy making. On FCC, Sikes said he hopes to see the first non-operational license issued in 1992. ■

# Bell Atlantic, Nynex To Test Video-on-Demand

CONTINUED FROM PAGE 1

video on cost drawbacks. "He said, 'But there's been no contact as yet from vendor cost curves.'"

At Nynex, the first project involving video to go public is an effort to set up a link between RBOC's facilities in Wake Forest, N.C., and Dow Jones & Co.'s floor at the World Financial Center in lower Manhattan. By November, the two firms hope to be transmitting information back and forth, with Nynex supplying the port and video storage facilities and Dow Jones supplying the rest.

Roger May, a spokesman Dow Jones, characterized the project as an exploration of what applications of video might be able to enhance the various information feeds the company supplies to business customers. These include real-time financial information known as Teleterm as well as access to various data banks. Dow Jones also has a television newsroom at Wall Street Jour Television, which provides weekly syndicated broadcasts; program and short daily business segments to stations across the country.

Several video information feeds made available at the same type call-up format through menu commands used in text service. For example, a user could want to learn more about a company or an issue by calling a nearest government hearing or getting access to a video production firm.

Initially, there will be no central users on-line in the although simulated user bases will be employed. Nynex spokeswoman Janine Mudge said the companies want to begin developing the service commercially by next summer. Mudge would have to file a plan with the New York Public Service Commission.

The initial thrust of any commercial service would be low-cost corporate users of Dow Jones' services, the company said. Because the video port would be an adjunct to the Dow Jones Information Retrieval Service, it is not viewed as a type of service that would fall under the purview of the Cable Act. Mudge declined to discuss other possible applications for the service and other technologies it Nynex would develop, but she acknowledged that such a multiauthor distribution system could be used for a much larger subscriber base.

For the trial, Mudge said, Nynex has ample capacity to carry the information. However, digital service between sites. What type of transmission and network technology would be used for commercial distribution hasn't been decided.



numbers.

In 1991, we challenged the industry to join us in making a major commitment to revitalizing Premium Television. Our goal was to restructure Premium in ways that pre-established its value and affordability to subscribers. We said, "Become partners with SNL. We'll share risks, maximize rewards, and together, introduce a new era of exciting growth for both of us."

Today, that new era is here. Innovative ways of packaging, pricing and marketing Premium are delivering dramatic, consistent growth. In fact, MVD's like Strips, Howard, Cardinal Communications, and Marcus (4th Partners) increased premium units and cash flow since restructuring with SNL. Cardinal and Marcus also jumped 10% or more in total premium homes. That's a big step forward.

To further accelerate success, SNL is launching "FLIX" this summer, an exciting new 24 hour movie network featuring new 70's through the 80's with selected recent titles. Flix is designed to support the growth of Premium Television by adding value to premium households.

With SNL, the momentum continues. Restructuring is working. Call your SNL representative today, and make '92 your best year ever.

# SHOWTIME NETWORKS

II. Complaints about misuse of the radio airwaves.

- seven compliant letters and other articles concerning "shock radio" in the Atlanta market.

# MacScribe Studios

GRAPHIC DESIGN • WRITING & EDITING

P.O. BOX 870313, STONE MOUNTAIN, GA 30087 • (404) 498-6974

February 11, 1992

Dr. Beverly Chain  
Office of Communications  
United Church of Christ  
700 Prospect Avenue  
Cleveland, OH 44115

Dear Dr. Chain:

Hans Holznagel suggested I write to you about a deep concern I have over what has happened to the FCC. I tracked down your organization because a friend loaned me a copy of your 1971 publication, *Guide to Citizen Action in Radio and TV*. (If this has been updated, I certainly would like a fresh copy.)

Four months ago I started listening to two politically conservative radio talk shows, one local and one national, to learn what "conservatism" means in the 1990s. I was shocked, to say the least, with the racism, sexism, homophobia, and classism I hear legitimized by the talk show hosts and their fans.

As the direct result of an incident which happened to me when I spoke up publicly in criticism of these shows (see attached), I have become interested in exploring the FCC's current regulations concerning the use of the public air waves, and have found out, to my horror, that some of the FCC guidelines which once provided some protection and fairness were essentially gutted during the Reagan/Bush era under the premise of restoring First Amendment Rights to broadcasters. [See the FCC's Mass Media Bureau Publication 8330-PA, available from the FCC, 1919 M Street, NW, Washington DC 20554, phone (202) 632-7586.]

I want to make it very clear that my interest goes far beyond my own small complaint to the much larger picture, since the problem itself is not small and isolated at all, though full details of my own run-in with radio talk shows is enclosed. The incident that involved me serves as a catalyst to me and an example of the larger problem. Nor am I, an ardent First Amendment Rights supporter, suggesting anything bordering on censorship.

I have requested additional information from the FCC and am contacting as many organizations as come to my attention to see what, if anything, they are doing in this area. If you have any suggestions for additional contacts (organizations or individuals) I should be in touch with, or if you have other publications or resources that are appropriate for me, please let me know.

I have been in contact with Georgia's Congressman John Lewis's Legislative Director, Julius Hall, who is providing me with a copy of HR 2977 to review, and seems interested in both what that

piece of legislation entails, as well as the problem in general. I am sending him a copy of all this material as well.

Again, any information or further resources you can provide, any further resources you can direct me to would be appreciated. I would also be very interested in learning more about what your organization is involved in beyond any interest in this subject.

And may I give my congratulations on that 1971 publication — it is marvelous, though by this time hopelessly out of date in some areas. I do hope there is an updated version available.

Thank you for your attention to my request.

Sincerely,



Pat Santhuff  
6531 Gray Hawk Way  
Stone Mountain, GA 30087

cc w/enclosures: Hans Holznagel  
William Winslow

Enclosures: Reclaiming The Airwaves — My story  
Notes from WGST broadcast on Jan. 20  
Jan. 4 column in *The Atlanta Journal/Constitution* by Dick Williams  
My Letter to the Editor, Jan. 19  
My Letter to the Editor as printed Jan. 25  
Article, "The sorry condition of Atlanta talk radio," Mike Malloy,  
*Atlanta Journal/Constitution*, Feb. 5  
Letter to the FCC requesting additional information

March 26, 1992

**Complaint re:  
Neal Boortz (Talk Show) Program, WGST, Atlanta, GA  
Wednesday, March 25, 1992, top half of the 11:00 hour  
(between approx. 11:10 and 11:25 a.m.)**

**Recap of Broadcast, Part 1**

Mr. Boortz brought up the *Newsweek Magazine* cover (March 30, 1992) which featured Democratic Presidential Candidate Bill Clinton in a pose Boortz characterized as "sexy." He further commented that this was probably the look Clinton had on his face "the first time Gennifer Flowers took off her bra" for him. He said *Newsweek* was trying to get women to vote for Clinton, and went on to say that giving women the vote was a "colossal mistake" because women do not vote for ideas or ideology or the issues (however he phrased this idea), but rather they vote for who they would like to see/have "between the sheets." I don't think Boortz even had the grace or good sense to qualify this remark by saying "some women."\*

\*Note: Obviously, this is not an official transcripts of the show. Here and elsewhere, those words and phrases enclosed in quotes are what I believe to be extremely accurate if not exact quotes. The rest of my account of this portion of the show are, I believe, accurate representations of the substance of the comments made, and/or close paraphrases, but obviously are not/cannot be, actual quotes.

**Broadcast, Part 2**

Shortly or immediately after the above comments regarding women's votes, Boortz took a call from a listener who identified himself as the "ex-step-son" of a local female County Commissioner in her early 50's who is running for County CEO this year. Boortz despises this woman, for reasons unknown to me other than the fact that she is a liberal Democrat and favors gun control. He regularly denounces her on the air in personal terms, that is *other than* in regard to any issues (at least his comments have not been issue-oriented in the instances I have heard).

The caller/ex-step-son was the first one to use the term "political whore" but Boortz picked up the discussion, and went on to comment that anytime there is anyone who could possibly deliver a bloc of votes for her, she "falls over backwards" and "lubricates — politically speaking."

Boortz also suggested, none too subtly, that listeners attend County Commission meetings and, while looking directly at her, "lick their lips."

by: Pat Santhuff  
P.O. Box 870313  
Stone Mountain, GA 30087  
(404) 498-6974

4/7/92

## Re-Claiming the Airwaves

by Pat Santhuff  
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### Background

In early January a columnist for the *Atlanta Journal Constitution* wrote deploring the "gross language and sexual innuendo" on two radio stations in Atlanta (copy enclosed). Several readers subsequently wrote in support of his views and a former broadcaster also contributed an article which appeared February 5 on the subject (copy enclosed).

I had already been considering sending a letter to one of the stations to complain about the "blatant racism and sexism" I found on this station and decided instead to write a letter to the paper and copy the stations involved, which I did on January 19. I sent copies of my letter to the General Managers of both stations as a courtesy and to communicate my concerns with them directly.

### A Public Personal Attack

On Thursday morning, January 23, one of the talk show hosts I had mentioned in my letter along with an example of what I considered "blatant racism" proceeded to excoriate me on the air at length.

I had not anticipated and was totally unprepared for this outcome, though as the event unfolded I immediately recognized how my own actions had made this public attack possible. Even so, had I wanted to confront this talk show host directly, I would have copied him rather than the General Manager on my letter, or written/called him personally.

He gave my name repeatedly — and spelled it. He gave my business name repeatedly — and spelled that (since I had written my letter on my business stationery). He made it quite clear he thought the letter was written by a woman, and repeatedly addressed me in his diatribe as "Mrs. Santhuff."

Friends to whom I have related this asked if he were inviting his more ardent fans to harass me. If so, it worked, because during the broadcast I received two anonymous phone calls (both from men), one of which told me with glee in his voice, "You're *really* getting it. Neil is really giving it to you." When I asked politely who was calling, the first caller hesitated and said, "A friend of Neil's [the talk show host]" and hung up. The second caller, the gleeful one, merely hung up.

### Representation of Women during the Broadcast

My portion of the broadcast occurred in the first half of the 11:00 hour. (Notes taken from the broadcast are either enclosed or are available on request). Afterward, the topic went on to less controversial issues and the discussion was fairly congenial.

During the last several minutes of the broadcast, the show host conducted what he calls "flushing the lines," during which each caller is told "You're on the air," and then given a brief opportunity to make a comment, tell a joke, or just be silly. Some were in exceedingly poor taste, but two calls went well beyond issues of taste.

The first was some comment about Winnie Mandela who had been the subject of negative discussion during the week, followed by the comment, "Someone should do her in the mouth." The talk show host broke tradition by responding to this comment and said, "He means hit her in the mouth," which made it all the worse because it forced listeners to recognize the *sexual* content of the caller's violence-condoning remark. (Prior to reviewing the tape the following afternoon, I thought the caller was possibly referring to me since I hadn't heard the reference to Mandela because of poor telephone transmission.)

The other call was even more chilling. In a cold, flat tone which was anything but humorous, the male caller said: "Remember the guy who cooked his girlfriend and made soup out of her?... You know what he said when he was being dragged away by the police? 'At least the bitch was good for something.'" The punch line was accompanied by audible laughter in the background at the station.

#### **A Question of Responsibility — But Whose?**

I live in an area known for its Ku Klux Klan activity. Frankly, sending my letter to the paper was something of an act of courage for me since I am not one who has been comfortable having my name in front of the public. So after this (I believe) unnecessarily rough treatment on a broadcast which caters to men and which seems to endorse racism, sexism, homophobia, etc., I was a bit frightened.

Later in the afternoon I told my husband who was out of town that I didn't know how much concern for my personal safety could be considered paranoia and how much lack of concern might be considered naivete. He suggested perhaps there was a middle ground which might be called prudence. At his urging, I asked the County police to patrol the house several times that night. And then, partly because I felt so battered and wounded, and partly because I was a little more frightened than I had allowed myself to admit, I spent the night with friends.

As I left the house that afternoon, turning on lights, closing draperies I never close, and considering whether to leave the television on all night, the thought flashed across my mind: "What if all I have left in the morning is what I'm carrying out with me?" I realized this *was* overreacting and quickly put it out of my mind. But then I felt angry and resentful that I live in a society where violence against women is epidemic—a society in which such a thought could even cross my mind, however fleetingly.

Before leaving my home that afternoon, I contacted the station to ask for a transcript (no, not enough manpower), or a copy of the tape (no, their attorneys say only "under subpoena"), and finally an opportunity to review the tape, which they granted. I was glad I did review the tape — it was both worse in some ways and better in other ways than I had heard it as it aired. And yet, I am still stunned with the viciousness with which a woman who dares criticize could be treated in an effort to silence opposition and quell an open debate of public concern and interest.

This talk show host maintains a position that leaves no room for personal responsibility for his actions, his pronouncements, his attitudes. For example, as a blanket disclaimer, he routinely says that everything he says on the air is pure "b.s." or "bullshit," and that it is all entertainment. Not being a journalist, he certainly would feel no compunction to comply with any standards of responsible journalism or that profession's ethical guidelines. And as a non-journalist, he probably wouldn't be covered by any FCC discussions regarding broadcast journalism's role on the

public airwaves. I believe it's possible that all this is very clever, very well thought-out regarding existing FCC and legal restrictions.

**The Next Essential Step: Reclaiming the Air Waves**

A friend suggested that probably none of this — not the racism/sexism, etc., nor my treatment at the hands of this talk show host — could have happened under “the old FCC guidelines.”

The more I thought about her comment, the more it made sense to me. My own private complaint is not the issue at all, but merely an example — just one small part of a much larger problem — in fact, just a symptom of it. Our problem (and it is “our” problem), is: what has the FCC become, and how do we correct it?

It is my intention to explore thoroughly the FCC guidelines that are relevant, license renewal requirements, what other groups are active in this arena, and a more in-depth study (probably including taping a number of programs) of these and other radio stations' programming in order to address what I set out to address in the first place: the “blatant racism, sexism,” homophobia, ageism, anti-Semitism and classism I hear and which I firmly believe does great harm to our society.

Pat Santhuff  
P. O. Box 870313  
Stone Mountain, GA 30087  
(404) 498-6974

# MacScribe studios

GRAPHIC DESIGN • WRITING & EDITING

P.O. Box 870313, Stone Mountain, GA 30087 • (404) 498-6974

February 6, 1992

Ms. Marsha McBride  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

Dear Ms. McBride:

Recently I contacted you by phone and you sent me information regarding the current FCC personal attack rule, Mass Media Bureau, Publication 8330-PA. Thank you for your prompt response. Now I would like to request any and all additional information available on the following topics, on behalf of myself and a large and growing handful of people in the Atlanta area interested in studying this subject in depth due to some local radio programming issues on a number of stations:

- the Commission's "programming requirements" for commercial radio stations
- guidelines regarding radio stations meeting the "needs of the communities"
- what is considered "news distortion and presenting false and deceptive programming"
- requirements for re-licensing of radio stations, and especially how citizens can file *effective* complaints if stations are not meeting their responsibilities to the community (and other issues), including the process through which such complaints move through FCC and what individual stations are required to do in reply or action in response to such complaints
- what the FCC's definition of "journalists" and "journalism" is, especially in regard to radio talk show hosts who may not technically have journalism backgrounds (education and/or hard journalism experience)
- who the relevant department heads and/or Commissioners are for all these concerns
- how we can request copies of legal decisions or other documents (or relevant portions thereof) cited in the information you sent (or will be sending) from the FCC
- the names, addresses and phone numbers of any groups, publications or members of Congress you may know of who are working on strengthening the FCC's enforcement of all these issues to pre-1984 (or prior) standards, including the re-institution of the personal attack and/or equal-time/equal access portions on controversial issues. (Typical examples might include Public Citizen, Common Cause, etc.)
- the names, addresses and phone numbers of any broadcast industry groups working for or concerned with ethics or responsibility in broadcast

Thank you very much for your prompt attention to this matter. Please mail the information to me at the following address:

6531 Gray Hawk Way  
Stone Mountain, GA 30087

Sincerely,

Pat Santhuff

March 30, 1992



Atlanta NDW • PO Box 8556  
Atlanta, GA 30306-0556

Ms. Pat Santhuff  
6531 Gray Hawk Way  
Stone Mountain, GA 30087

Dear Ms. Santhuff:

We applaud your efforts to bring the excesses of such radio stations as WGST and WSB to the attention of people in Washington who are concerned about the effects of the FCC's 1987 decision to stop enforcing portions of the Fairness Doctrine.

For some time we have been aware of the blatant sexism and only slightly more subtle racism and homophobia which air on these programs, and of the deleterious effect this has on our community. In an era when violence against women and the incidence of hate crimes is increasing, we strongly believe that these programs actually contribute to the problem by legitimizing divisive and harmful attitudes (and ultimately actions) against minorities, women, and gays, and at the very least should be countered by responsible programming which airs opposing views.

Please pass our letter on to your contacts in Washington and keep us apprised of any further developments.

Sincerely,

Sarah Dailey  
Co-Chair

226 Haven Brook Way

Atlanta, Ga. 30319

Monday April 6, 1992

Dear Pat Santuff

I find the F.C.C. is not enforcing Fairness in talk shows such as put on by W. G. S. T. My belief is that when an extreme view from the right is portrayed then the fair thing to do is to air the view of the extreme left. A view from the extreme right should not be classified as conservative nor should a moderate be classified as an extreme leftist liberal. I would like to also point out the bad treatment that a caller receives when his or her view is contrary to the talk show host. I would not subject myself to such treatment so the result is that I never call in. I'm sure that there are many, many people such as I. I would welcome an inquiry into the non enforcement of the Fairness Doctrine

Sincerely yours  
Joseph Cusucolo

499 Northside Circle, Apt. 813  
Atlanta, GA 30309  
March 28, 1992

Pat Santhuff  
6531 Grey Hawk Way  
Stone Mountain, GA 30087

Dear Ms. Santhuff:

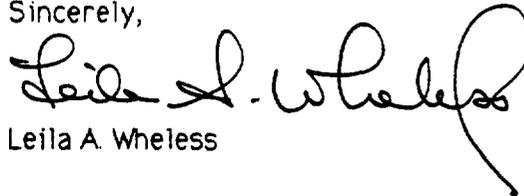
I congratulate you for your admirable campaign to ask the FCC to reinstate--and enforce--parts of the so-called Fairness Doctrine that require the media to present opposing viewpoints in their programming. People such as Rush Lindbaugh and, on the local level, Neil Bortz, make merry sport of women (especially feminists), minorities of all kinds, and anyone else who disagrees with their elitist conservatism.

The most disagreeable aspect of such programming is not, however, the fact that far-right-wing opinions are being aired all over this country daily; nor is it the sad fact that these bozos have an increasing audience who actually believe what they say. The real problem is that these conservatives are not allowing people who disagree with their harsh beliefs to participate in a fair counterpoint exchange. Of course, Lindbaugh and Bortz would contest such a statement, saying that anyone is welcome to call or write their programs and have their opinions broadcasted. In reality, the courageous people who do phone or write such stations risk being edited and ridiculed on the air as you were.

Omitting or sometimes viciously ridiculing people's opposing opinions is an opportune way to perpetuate misunderstanding, mistrust, and hatred. In an era when we are already inundated with these evils, why shouldn't we do our best to fight those whose only goal is to make money by exploiting people's fears of "The Other"--whether that other be African Americans, the homeless, women, or any other group?

It's time we demand the FCC to reconsider its disastrous 1987 decision eliminating crucial segments of the Fairness Doctrine. Consider this letter my vote of support.

Sincerely,

A handwritten signature in black ink, appearing to read "Leila A. Wheless". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Leila A. Wheless

2107 East Lake Road  
Atlanta, GA 30307  
March 30, 1992

Ms. Pat Santhuff  
P.O. Box 870313  
Stone Mountain, GA 30087

Dear Ms. Santhuff:

I support your effort to encourage WGST and other talk radio stations to serve the public interest by observing the fairness and equal time doctrines.

When I hear a talk show host railing against welfare mothers or civil rights activists, I think of how Hitler blamed Germany's economic problems on the Jews. It distresses me that some talk show hosts seem to promote scapegoating as a solution to social and political problems.

I would rather hear a balanced discussion of the issues moderated by someone who has more than a superficial understanding of politics, current events, and the Bill of Rights. More honest discussion and less name calling might go a long way toward solving problems instead of adding to them.

I realize that WGST carries Larry King, who interviews authors who have written books on timely subjects, but most people have gone to bed before he comes on. WGST also carries an excellent and informative ABC news program with commentary by Hugh Downs, but that airs on Sunday morning before most people get up.

Perhaps WGST should run Larry King and Hugh Downs in the daytime, and Neal Boortz and Rush Limbaugh between 11:00 p.m. and 7:00 a.m. at least half the time.

Sincerely,



Gale Walldorff

854 Barton Woods Road, NE  
Atlanta, GA 30307  
March 30, 1992

Ms. Pat Santhuff  
P. O. Box 870313  
Stone Mountain, GA 30087

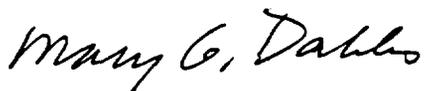
Dear Ms. Santhuff:

Last week I attended a neighborhood political forum and heard that Neal Boortz on WGST-AM had made some crude slurs of a sexual nature against DeKalb County Commissioner Sherry Sutton, a fifty-year-old mother of two grown daughters. While I rarely listen to Mr. Boortz and did not personally hear him make those particular remarks, I have heard him call Ms. Sutton "brain dead," which I find inappropriate and offensive.

I listened to Neal Boortz today and was not surprised to hear him rail against a government subsidized research project concerned with African-American gardeners. However I was surprised to hear him say that he would not consider running for public office because he would not want his personal life to be free game for public speculation. Perhaps he is afraid that some other talk show host would suggest that he was having an affair with a well-known male tennis pro or was "lubricating" the block vote. He has certainly helped set the tone for that kind of unsubstantiated and harmful speculation.

I believe that if the Federal Communications Commissions reinstated the fairness and equal time provisions and enforced them, it would be in the public interest. Talk radio as it now exists is not.

Sincerely,



Mary G. Dabbs

854 Barton Woods Road, NE  
Atlanta, Georgia  
January 27, 1992

Letters to the Editor  
The Atlanta Constitution  
P.O. Box 4689  
Atlanta, GA 30302

Dear Editors:

Pat Santhuff's January 25 letter reminded me how much I miss the fairness and equal time rules that used to regulate radio and television stations. While talk radio was never a substitute for reading, it was sometimes mildly informative and even occasionally thought provoking, as long as the Federal Communications Commission (FCC) required stations to provide at least a minimum of public service in exchange for access to the airwaves.

The hours devoted to Rush Limbaugh and others like him prove that radio stations need the fairness and equal time rules to prevent them from selling freedom of speech to the highest bidder. The Bill of Rights is for everyone.

I suspect that the new laissez-faire attitude of the FCC is also responsible for a distressing trend in the way television covers elections. In recent years political news is often no more than a comparison of the paid political ads of the various candidates who can afford to advertise on television.

I think it is time for people who care about democratic process to work toward getting the old FCC regulations reinstated.

Sincerely,

Mary G. Dabbs  
(378-7368)

CC: John Lewis  
FCC  
WGST

# In '92, clean up filth logging our local radio

I have a wish for the New Year. It is both atmospheric and environmental. No law is needed, only taste.

The fond wish is for gentlemanly behavior and a restoration of standards on local airwaves.

The past year was a breakthrough, a year in which calculated "shock" radio gave way to going bad taste. And it spread several mainline stations, distinguished in the past for their understanding that large, diverse audiences of all ages listen to radio and many derive their standards from it.

Afternoon drivetime, in particular, is a cloud of atmospheric illusion. Gross language and sexual innuendo dominate the conversation. True humor and wit take second place to the horny sexual references of talker rooms and truck stops.

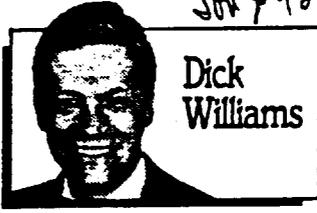
The danger here is that bad taste is enveloping adult stations. When FM-96 Rock's morning show pushes the envelope for rebellious young people, it is more acceptable than when WGST and SB, the AM stations for adults interested in conversations and news, descend into the mire.

I argue the subject regularly with WGST's Neal Boortz, who led the World Series to turn the mahawk into a racial and sexual symbol. Mr. Boortz will leer at the best of them, but he tries to meet a generally accepted standard of language. He tends to wink more than slobber.

In the afternoons, however, WGST for more than a year has sounded like bad burlesque, diminishing the station's news professionals such as Tom Hughes and Denis O'Hayre.

The departed Brian Wilson shed female callers "a wonderfully orgasmic day." He drew the ire of state Rep. Nan Orrock the afternoon when he described workers having "mutual foreplay" and when he said of a well-lit woman, "I liked the way her breasts bounced."

Ms. Orrock called to point out that his sexual innuendo is crude and offensive to a great



Dick Williams

many women," only to receive more of the same in return.

Mr. Wilson, who also talked of pistols and rifles in a near-sexual manner, was replaced by one Freddie Mertz, who is fond of discussing masturbation, urging its daily practice and asking callers if they've practiced today.

The switch from Mr. Wilson to Mr. Mertz was a move from open sewer to sewer of the psyche.

The new man trolls for dates on the air (and apartments and cars) and gives listeners insights into his character that only a psychiatrist can love.

The alternative to WGST for news, weather and traffic is WSB, the proud and powerful voice of the South. The abrasive David Paul holds forth through mid-afternoon, giving way to Gary McKee and company for drive time.

Mr. McKee, a popular veteran, understands Atlanta and is a gentleman first. His sexual innuendo is more subtle and balanced by a woman foil in the studio.

But Mr. McKee regularly slips in the barnyard epithets we try not to say around the kids. One is played on a tape cartridge for comic relief. The same four-letter stuff graces a great many frequencies these days.

Put bluntly, George Carlin's "seven words you can't say on television" are glorified on mainstream radio. Talk radio today would have been unthinkable just a decade ago.

Without being puritannical, cannot standards be imposed? Or must our city's radio studios be washed out with soap and water? It worked at my house. □

Mr. Williams is a Journal editorial columnist.

# Shock radio's racism, sexism could reap violence

## LETTERS TO THE EDITOR

Jan. 25, 1992

I am also offended by the objectionable language on some of the radio talk shows in town.

However, I am far less offended by the "expletive should be deleted" sort of thing than the blatant racism and sexism.

The racism and sexism legitimize unsavory attitudes, and ultimately, bigoted and discriminatory actions. This is unforgivable, and I am ashamed that a city "too busy to hate" allows it in any form.

I can only conclude, not only from radio but also much that I see in our print media, that it is now "politically correct" to be racist — under the guise of opposing affirmative action, "quotas," "multiculturalism" and "cultural diversity," not to mention social programs.

It's also OK to be sexist under the guise of disseminating inaccurate and usually sensationalistic "disinformation" about the wom-

en's movement and feminism.

As an example, I can only characterize nationally syndicated Rush Limbaugh's term "feminazi" as yellow journalism. It's perfectly acceptable to disagree. It's not fine, and used to be considered un-American, to attempt character assassination on people espousing opposing viewpoints.

This type of talk show host has difficulty enduring phone calls from people with different points of view. Such callers, no matter how courteous and reasonable, are ridiculed, interrupted, disparaged, hung up on and otherwise abused, thus discouraging such calls and enhancing the talk show hosts' egos even further.

PAT SANTHUFF  
Stone Mountain

It is sad that another venerable and respected tradition has gone

with the wind.

"Welcome South Brother," the "once powerful voice of the South," to quote Dick Williams in a recent column, has sunk to unbelievable depths in terms of bad taste and low standards.

David Paul's entrance into the studio marked the beginning of the end. The more he took over, the worse it got.

The management seems to have forgotten, what made the station great, one that we trusted for integrity and dependability.

I wonder what audience the management is trying to attract with talk of that nature?

With all the power of broadcasting range, WSB keeps us bound into local talent (?) when it has the capability of becoming the WLS of the Southeast.

It makes us long for Elmo Ellis.  
EVELYN POWERS  
Atlanta