

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In re Application of)	MM Docket No. 93-94
)	
Scripps Howard)	File No. BRCT-910603KK
Broadcasting Company)	
)	
For Renewal of License of)	
Station WMAR-TV,)	
Baltimore, Maryland)	
)	
and)	
)	
Four Jacks)	File No. BPCT-910903KE
Broadcasting, Inc.)	
)	
For a Construction Permit for)	
a New Television Facility on)	
Channel 2 at Baltimore, Maryland)	

To: The Honorable Richard L. Sippel
Presiding Administrative Law Judge

SCRIPPS HOWARD BROADCASTING COMPANY EXHIBIT 3A

TESTIMONY OF EMILY L. BARR

Respectfully submitted,
Scripps Howard
Broadcasting Company

By: Kenneth C. Howard, Jr.
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Dated: October 6, 1993

<u>Federal Communications Commission</u>	
Docket No. <u>93-94</u>	Exhibit No. <u>3A</u>
Presented by <u>Scripps Howard</u>	
Disposition	Identified <u>10.6.93</u>
	Received <u>10.6.93</u>
	Rejected _____
Reporter <u>Celia Walker</u>	
Date <u>10.6.93</u>	

III. ISSUES ASCERTAINMENT

22. WMAR-TV's management and staff participate in a number of types of ascertainment efforts as part of an ongoing process to determine the issues of concern to the Baltimore community. The results of those ascertainment efforts are then utilized to plan and implement the station's programming and public service activities.

A. Ascertainment Efforts

23. ^{During the Renewal Period} WMAR-TV's management and staff regularly conduct^{ed} individual ascertainment interviews with a broad spectrum of leaders of the community and with members of the general public. In addition to me, the station personnel with this specific job responsibility and who conducted such interviews ~~both prior to~~ and ~~during~~ the Renewal Period included Arnold ("Arnie") J. Kleiner, the General Manager; Janet Covington, the Director of Public Affairs; Maria Velleggia, the Director of Public Relations; Bob Feldman, the News Director; Willy Walker, the Executive Producer; and Harry Kakel, the Production Manager.⁵ Ascertainment interviews were augmented by the daily input station personnel received from outside sources, including newspapers and other periodicals, radio, and other contacts with

⁵ Attachment D contains the resumes and other personnel information about these employees (except for Arnie Kleiner and me) taken from the station's files and kept in the ordinary course of business. The least experienced of these employees was Maria Velleggia, who began as Assistant Public Relations Director of WMAR-TV in 1985. The most experienced was Janet Covington who started at WMAR-TV in 1948 and served as Public Affairs Director of WMAR-TV from 1975 through 1991.

During the Renewal Period
individuals in the community. WMMR-TV encourages employees at ✓
all levels to participate in the process of ascertaining
community issues and help develop issues-responsive programming.
It was my responsibility, with Mr. Kleiner, to ensure that WMMR-
TV maintained contact with a wide range of groups in the
community. During the Renewal Period
The station undertook affirmative efforts to ✓
maintain close contacts with church and community group leaders
representing minority group interests, among others.

24. In addition to my other ascertainment efforts during
the Renewal Period, I read the Baltimore Sun daily and the
Baltimore Business Journal weekly, plus I received and regularly
read approximately six publications addressing community issues,
including the Citizens Planning and Housing Authority's
newsletter (published quarterly); the Action for the Homeless
newsletter, Homefront (published quarterly); the Maryland Food
Committee Monitor (published monthly); and periodic reports from
the Children's Guild. I have been reading these publications
since at least 1989, and they have provided information about
the Baltimore community and contributed to programming decisions
at the station, during the Renewal Period ✓

25. Further, through my involvement in the community
during the Renewal Period, I was able to maintain a continuing,
informal dialogue with community leaders and members of the
general public about community issues. The knowledge that I
gained from those discussions was considered in and served as

a backdrop for all programming decisions in which I participated ^{during the License Term} ✓

26. The more formal individual ascertainment interviews were conducted in various locations, including the station, the interviewee's place of business, or some other mutually agreeable location. The topics discussed at each ascertainment interview depended on the concerns of the interviewee and any organization the interviewee represented.

27. If the ascertainment interview was conducted by someone under my supervision, that individual usually would give me a verbal report about the interview. This report would either be given to me during a one-on-one meeting or, more typically, during a weekly staff meeting I held with the station employees I supervised. At this weekly meeting, called the "Barr Group," the six people I supervised reported to me on their areas of operations including the ascertainment efforts they had made during the preceding week. The participants in the Barr Group meetings during the Renewal Period were Harry Kakel, Janet Covington, Maria Velleggia, Kathleen Baylies (Director of Creative Services), Dave Horner (the Art Director), and occasionally Tonie Wright.

28. With respect to ascertainment interviews conducted by a department head, the interview often would be discussed at the weekly department head meeting or in informal luncheon meetings that were held frequently in Mr. Kleiner's office. The participants in the department head meetings during the Renewal

Period were Arnie Kleiner, the General Manager; Bob Feldman, the News Director; Joe Bruno, the Engineering Director; Bob Imhoff, the Controller; Nancy Schachnovsky, the Human Resources Director; Howard Zeiden, Director of Sales and Marketing (until August 20, 1991); Kathleen Baylies, Director of Creative Services; Maria Velleggia, Public Relations Director; and myself. At the department head meeting, each participant gave a brief report of issues and developments in his or her area and information was exchanged informally among the managers.

29. At both the Barr Group meeting and the department head meeting, the participants would discuss, among other things, the issues that had been ascertained and possible responses by the station, including programming, to those issues.

30. The weekly department head meetings were augmented by a monthly department head report, which the other department heads and I each submitted to Mr. Kleiner to use in his monthly General Manager's report. My monthly department head report normally contained information on public affairs, programming, and production. My monthly report discussed any special programming that was being planned or had recently been produced or broadcast. My monthly report also explained the reason for the special programming and whether it was in response to any ascertained issues. These department head reports were not routinely kept in the ordinary course of business.

31. In addition to the above ascertainment procedures, I received regular daily feedback on what issues were of primary

concern in the community from the station's full-time Public Affairs Director, Janet Covington. The Public Affairs Director's responsibility includes^d being aware of the issues ✓ that ~~are~~^{were} of paramount concern or interest in the community, at ✓ ~~any given time~~ Ms. Covington's ascertainment reports to me ✓ were based on her personal ascertainment efforts that were undertaken in the context of her job, information she received from other station employees regarding their individual ascertainment efforts, ~~and any Community Advisory Board (see 0 infra) meetings held during the relevant time period.~~ ✓

32. Issues that affect a community do not remain static throughout a particular quarter. Instead, those issues change and evolve constantly. A television station must respond to those changing issues as they arise. Ms. Covington's daily visits to my office gave immediate feedback to me on community issues. These discussions helped station management stay abreast of community issues as those issues developed so that the station could make prompt programming responses to developing issues. For example, Ms. Covington's community contacts played a role in the decision to produce the September town meeting, "Surviving the Streets," (discussed infra) which was a subject of our ascertainment discussions during July and August of 1991. Another important part of the process of sharing issues ascertainment efforts with management was that frequent informal discussions occurred among Mr. Kleiner, Ms. Covington, Ms. Velleggia, myself, and the other station

personnel who were involved, some frequently and some infrequently, in the ascertainment process.

33. Issues ascertainment ^{was} ~~is~~ a standard part of the operation of WMAR-TV ^{during the Renewal Period} and the various informal discussions among station personnel and between station personnel and members of the community that are part of issues ascertainment ^{were} ~~are~~ likewise a part of the day-to-day operation of the station. For example, Ron Shapiro, a prominent Baltimore attorney active in civic affairs, met with me on a weekly basis, including during the Renewal Period, to discuss the program he hosts, "Front Page." Mr. Shapiro served as an excellent source of information about civic and community issues. Separately, Reverend William Calhoun, pastor of Trinity Baptist Church and then a member (now president) of the Interdenominational Ministerial Alliance (a longstanding organization of prominent local religious leaders), participated weekly in the taping of WMAR-TV's locally produced inspirational gospel music show, "Lift Every Voice." On a regular (at least monthly) basis ~~(including)~~ ^{during the Renewal Period}, he stopped by my office before taping the show to discuss issues which he would identify as of concern to the community.

34. The preparation of the issues/programs list also played a role in the ongoing ascertainment process ^{during the Renewal Period}. Its preparation focused my attention on the issues we had addressed in the previous quarter and served as the starting point for the next quarter's programming decisions.

35. The documents in Attachment E summarize 114 of the ascertainment interviews conducted by selected station personnel during the License Term (86 of these interviews occurred during the Renewal Period).⁶ Although it is impossible in many cases to tie specific meetings to specific programming, a number of the documents in Attachment E tie ascertainment interviews to specific news, public affairs programming, or PSA's. For example, among the ascertainment interviews discussed in Attachment E was a meeting between Norm Taylor, President of the United Way, and Mr. Kleiner on May 31, 1991 that led to airing a series of PSA's for the United Way Campaign during the License Term. See Attachment E at 1.

36. Page 10 of Attachment E reports a meeting Arnie Kleiner, Janet Covington and I held at WMAR-TV on June 6, 1991 with Dr. Sam Banks of the Baltimore City Public Schools and Hilton Bostick of the Oliver Community Association. The topics discussed at the meeting were the need for more positive images of African-Americans on television and the impact of the rising tide of urban violence and death on minorities. In part as a

⁶ The material in Attachment E was originally prepared in 1992 under my direction from information gathered by individuals working under my supervision. In preparing the attachment, I relied upon my own calendar and recollections and the calendars and recollections of Arnold Kleiner and Maria Velleggia. In addition, I relied upon discussions with and notes of Janet Covington, the former Public Affairs Director. At that time, Ms. Covington already was a former employee of the station who had volunteered to help me on her own time and who had kept these notes in her possession when she left the station. It did not occur to me to preserve Ms. Covington's handwritten notes after our discussions.

result of this meeting, both "2 the Point" and "Front Page" covered these subjects on numerous occasions in 1991 and 1992. For example, the August 11, 1991 edition of "2 the Point" profiled volunteer efforts to preserve an historic African-American cemetery. See Attachment F.⁷ The September 14, 1991 edition of "Front Page," planned during the Renewal Period, contained a story on a conference of African-American businesses. See id. Both of these programs served to promote positive images of African-Americans.

37. The issue of rising urban crime was addressed in, among other programs, a WMAR-TV Town Meeting on September 24, 1991 entitled "Surviving the Streets." See id. In this program, which was planned and scheduled during the Renewal Period, the Maryland State's Attorney, crime victims, law enforcement personnel and local citizens discussed the effects of crime and how to reduce crime in their communities. Id. The program featured three remotes from different neighborhoods in Maryland which enabled members of neighborhood watch committees to participate in the live meeting. Id. In addition, law enforcement officials answered viewer calls. Id. This Town Meeting simultaneously served as programming responsive to the issue of crime and as an ascertainment effort in its own right in that it allowed ordinary citizens, local leaders, experts, and station personnel to interact on this important issue.

⁷ Attachment F contains WMAR-TV's issues/programs lists for the second and third quarter of 1991.

38. Further examples of ascertainment efforts that can be tied directly to particular programming include a June 14 meeting that Rick White and I held with Craig Rocklin, the development director for Magic Me, a mentoring program for at-risk youth, that led to PSA's being produced to promote the organization and a three-part news series on Magic Me that aired in September and October of 1991 and was repeated with discussion on "Front Page" in October, 1991. See Attachment E at 18. In addition, on August 14, 1991, Maria Velleggia held a meeting with Mindy Mintz of East Baltimore Resources that ultimately led to Ms. Mintz's participation in WMAR-TV's December, 1991 Town Meeting "Surviving the Pink Slip." See Attachment E at 74. Additional examples of WMAR-TV's issues responsive programming are discussed, infra, in the section "Response to Ascertained Needs."

39. In sum, a decision to do some type of issues responsive programming typically was made based on a series of meetings, often with various community leaders, rather than on a discrete meeting that resulted in a discrete program. Likewise, a single ascertainment interview might cover a wide range of topics that would be covered in various programs. Issue ascertainment was and is a fluid and ongoing process rather than a mechanistic procedure in which a specific meeting and a specific program always can be tied together.

40. To augment WMAR-TV's ascertainment process, the station joined the Baltimore Broadcasters Coalition during the

Renewal Period at the express direction of Richard Janssen, then President of Scripps Howard Broadcasting Company. The Baltimore Broadcasters Coalition conducts joint ascertainment efforts. The first such meeting after WMAR-TV joined was not held until after the License Term.

41. Scripps Howard policy required that a written quarterly ascertainment report be prepared and forwarded to corporate headquarters by each television station, but WMAR-TV was given some time after the purchase to adjust its reporting practices to Scripps Howard's more formal approach. As a result, a written ascertainment report was not prepared or forwarded to Scripps Howard for the License Term, to the best of my recollection.

B. The Community Advisory Board

42. Since before I arrived at the station in 1988, as part of its regular ascertainment process, WMAR-TV has utilized a Community Advisory Board (the "Board"). The Board ^{was} ~~is~~ composed of individuals who ^{were} ~~are~~ leaders in various groups and organizations in the Baltimore community.* The Board meets with station management approximately six times per year to discuss issues of concern to various segments of the Baltimore community. Although the Board was in existence throughout the Renewal Period and individual members offered advice to station

* Attachment G is a list prepared under my supervision of the persons who were members of the Board throughout the License Term.

personnel during that period, no formal meetings were held during that time due to scheduling difficulties.

C. The Issues/Programs List

43. For each quarter during the License Term, the Program Manager, Tonie Wright, prepared the station's issues/programs list. To accomplish this after each of the second and third quarters of 1991, Ms. Wright received program descriptions from the station's news and public affairs program producers on the programming the station had presented in response to ascertained community needs. It was the responsibility of the producer to identify the issue to which the programming had responded. After preparing the list which demonstrated how the station's programming was tied to specific issues, Ms. Wright submitted it to me for review. Following my review, the issues/programs list was placed in the station's public inspection file and a copy was sent to Scripps Howard's corporate office and to station counsel.

44. In the third quarter of 1991, as a result of the acquisition of the station by Scripps Howard, there was a change in the types of programming included in the issues/programs list. Beginning with the third quarter of 1991, WMAR-TV became more selective in the type of programming included in its issues/programs list.

IV. RESPONSE TO ASCERTAINED NEEDS

A. General Practice

45. WMAR-TV consistently directed^{ed} its news, public affairs, ✓ and public service programming to respond to community needs as identified in its ascertainment efforts. This practice was followed throughout the License Term.

46. After ascertaining what issues were of concern to the community, the station's management determined what the appropriate response should be to the issues raised. In other words, we determined whether an issue should be addressed in a news report, on a public affairs program, as an editorial, through PSA's, as part of a town meeting, or in some other manner.

47. One of the sources we used in planning the next quarter's public affairs programs was the last quarter's issues/programs list, because the list identified those issues that were found to be ascertained needs in the community during the past three months.

48. With respect to public affairs programming, in consultation with the Public Affairs Director and generally based on discussion of the issue with other station personnel, I generally made the determination as to what was the best format for dealing with each particular issue. These discussions would include the people affected by the issue, the information available on the issue (including the programming the station had already offered on that issue) and the

appropriate responsive programming. Once the determination to produce a program was made, I contacted the appropriate individual on the programming end. If, for example, we determined that an issue would be a good subject for a particular public affairs program, I contacted the producer of that program.

49. An example of the way in which ascertainment results were translated into programming was a regularly scheduled meeting with Mike Convry, the producer of "Front Page," to discuss the issues to be addressed in upcoming episodes. This meeting enabled Mr. Convry and me to discuss issues that the station ascertained had arisen in the community and whether "Front Page" was the appropriate forum in which to respond to those issues. Once it was decided that an issue should be addressed in "Front Page," Mr. Convry did the production work associated with the program.

50. If we determined that the issue should be the subject of an editorial, I presented it to the Editorial Board, which is comprised of seven or eight persons from different departments at the station and chaired by the Public Affairs Director. The Editorial Board meets weekly and did so during the Renewal Period. At each meeting, proposed topics are discussed, with an emphasis on the timeliness of the subject and the probable interest in the subject to the community. Any member may propose a topic for an editorial. A democratic decision is then made by the Editorial Board as to which

proposed editorial will be given that week. During the Renewal Period, WMAR-TV's regular schedule included an editorial that was broadcast four times each week.⁹

51. If we determined that an issue would be appropriate for a news program, I contacted the news department or set up a meeting between the community members with relevant information and the news department. Although I did not supervise that department during the Renewal Period, I was in regular and frequent contact with the members of the news department about issues of interest and concern to the community and, as Director of Operations, I was familiar with the content of the programming that was broadcast on WMAR-TV, including the news.

52. I also maintained an ongoing informal dialogue with other WMAR-TV personnel regarding issues that appeared to be at the forefront of public concern throughout each quarter. During ^{the Renewal Period} ~~my time at the station,~~ WMAR-TV employees ^{were} ~~always have been,~~ encouraged to participate in public service and charitable events, whether station-sponsored or not, to help increase their awareness and sensitivity to community issues. This process helped WMAR-TV respond to community concerns arising. ~~in a~~ [✓] ~~particular quarter.~~ [✓]

53. PSA's are an integral part of WMAR-TV's responsive programming. WMAR-TV placed a minimum of eighteen PSA's on its

⁹ Transcripts of the editorials broadcast during the License Term are contained in Attachment H.

daily schedule, and during the Renewal Period WMAR-TV consistently exceeded this minimum number of PSA's per day.

54. When an organization contact^{ed} WMAR-TV about a PSA, the first issue considered by WMAR-TV ^{was} ~~is~~ whether the organization that ^{would} ~~will~~ benefit qualifies^d as a § 501(c)(3) charitable organization under the Internal Revenue Service's definition. If not, WMAR-TV ^{did} ~~will~~ not broadcast the proposed PSA.

55. Next, the Public Affairs Director assesses^d the relevance to the Baltimore community of the proposed announcement. We ensure^d that the PSA relates^d to a topic that ^{was} ~~is~~ of interest to the community or that ^{was} ~~is~~ likely to affect a significant portion of WMAR-TV's viewing community. If the Public Affairs Director has^d any questions or doubts about the potential relevance of the PSA to the local community, she discusses^d those questions with me.

56. Finally, the timeliness, quality, and content of the proposed announcement ^{were} ~~are~~ examined. Many organizations requested^d that WMAR-TV broadcast a PSA relating to a particular event. Often, the request ^{was} ~~will~~ not be made with enough time prior to the event for it to be broadcast. With respect to quality, the PSA's produced by some organizations ^{were} ~~are~~ of inferior quality, and do not meet the station's standards to be broadcast. In these cases, WMAR-TV ^{ed} ~~will~~ work with the organization to improve the quality of the PSA, if possible. Finally, the content of the proposed PSA ^{was} ~~is~~ compared to other proposed PSA's. We

attempt^{ed} to broadcast PSA's on a wide variety of subjects rather than repeating the same messages. ✓

57. In addition, during the ascertainment process, WMAR-TV often suggests to representatives of charitable organizations that a specific organization develop a PSA. In particular, if we determine that an ascertained issue would best be addressed by a PSA, we request that an appropriate organization develop one. WMAR-TV may assist the organization in developing its PSA.

58. During the License Term, WMAR-TV broadcast PSA's for over 200 different organizations in response to a wide variety of ascertained needs. See Attachment I.¹⁰ The vast majority of these PSA's were broadcast more than once.

59. The Baltimore community organizations whose PSA's were broadcast span^{ned a variety} ~~the gamut~~ of social, political, and cultural viewpoints. See Attachment I. Examples of organizations which sponsored PSA's that were broadcast are House of Ruth (a Baltimore home for battered women), the Baltimore Zoo, the Maryland Poison Center, the Baltimore Museum of Art, and the Chesapeake Bay Foundation. ✓

¹⁰ Attachment I, which was prepared under my supervision and summarizes the PSA's broadcast by WMAR-TV, only contains information about PSA's that WMAR-TV independently placed on its schedule. The log does not include PSA's that were broadcast by WMAR-TV as part of a network "feed." In other words, any PSA's that were shown on WMAR-TV simply as part of network-originated programming are not included in Attachment I, and all the PSA's that are listed in Attachment I as nationally produced nevertheless were independently selected for broadcast by WMAR-TV.

60. Most of these organizations' PSA's were chosen because they relate^d to an issue previously ascertained to be of interest and concern in the community. For example, education was identified as an issue of concern on the issues/programs list for both the second and third quarters of 1991. See Attachment F. During the first week of July 1991, WMAR-TV broadcast local PSA's on behalf of Baltimore City Public Schools seeking to curb violence in the schools, the Maryland State Teachers Association, the University of Maryland, Towson State University, the Upton School, which provides home instruction tutoring, and "Baltimore: The City That Reads." See Attachment I.

B. Specific Programming

61. Consistent with the general practice described above, WMAR-TV broadcast during the Renewal Period a wide variety of programs addressing many different ascertained community needs. The third quarter of 1991 was the first full quarter in which Scripps Howard was the licensee of WMAR-TV. Therefore, the programming for that quarter is listed first, and the programming for the second quarter of 1991, when Scripps Howard was the licensee for one month and two days, is listed second.

62. The information presented below is drawn principally from WMAR-TV's issues/programs lists, Attachment F. A substantial amount of additional issue responsive programming was presented during the station's news programming. An exhibit

listing such programming from the License Term is attached as Exhibit J.¹¹

1. Third Quarter, 1991

63. WMAR-TV offered programming responsive to ascertained public needs throughout the License Term. In the third quarter of 1991, WMAR-TV ascertained community interest and concern in the following areas:

- Education
- Literacy
- Economic Development
- Environmental Concerns
- Race Relations/Minority Concerns
- Homelessness
- Government Affairs/Legislation
- Redistricting
- Metropolitan/State Concerns
- Health and Safety
- Crime and the Criminal Justice System
- Supreme Court
- Cultural Development
- Youth Concerns
- Drug/Alcohol Abuse
- Performing Arts/Entertainment/Recreation

See Attachment F.

64. Each of these ascertained concerns was directly addressed with responsive programming in the third quarter.

¹¹ Attachment J was prepared under my supervision. It groups the local and network news stories aired by WMAR-TV on the identified date during the License Term according to ascertained issues set out in the issues/programs lists. The source materials for this summary are a printout from WMAR-TV's "Sportsfile," a compilation kept on WMAR-TV's computer in the ordinary course of business that lists the topics of the local news stories broadcast on WMAR-TV; network news story summaries provided by NBC, which are hard copies of documents kept on the network's computers in the ordinary course of business; and the issues/programs lists (Attachment F).

● Education and Literacy

65. WMAR-TV took a broad based approach to the closely related community concerns about education and literacy. The August 10 and 11 edition of the public affairs program "Front Page" featured a one-on-one interview with the new superintendent of the Baltimore City Schools. The weekly public affairs program "2 The Point," which addresses^d issues of concern ✓ to the African-American community, focused on education and literacy twice during the Renewal Period. On August 9, 1991, the program featured members of the literacy organization Baltimore Reads, who discussed the Ripken Reading Program that raises money for the organization throughout the Baltimore Orioles baseball season. The September 8 edition of "2 The Point" was devoted entirely to illiteracy, discussing Baltimore's commitment to solving the problem and programs available to assist those who are illiterate.

66. The education/literacy issue also was addressed by an encore presentation of a half-hour, WMAR-TV produced, prime-time special entitled "Milo's Secret." This presentation was scheduled for its September 13, 1991 air date prior to September 3, 1991. The story focused on a young puppet, Milo, who takes a part-time job and then attempts to hide the fact that he cannot read. With the help of his friends, Milo faces his problem and learns to read. Baltimore Orioles shortstop Cal Ripken appeared as Milo's neighbor and friend.

67. A fourth way in which educational issues were addressed is editorials and PSA's. On September 5 and 6, an editorial that was broadcast four times focused on the beginning of the new school year and encouraged members of the community to become involved in educational initiatives. This editorial was discussed and selected by the Editorial Board on September 3, 1991. Further, throughout the quarter, a large number of PSA's advocating education and literacy and supporting educators were broadcast on a regular basis. See Attachment F; and Attachment I.

68. Other programming broadcast, but not produced, by WMAR-TV was responsive to children's educational needs as well. "Romper Room" (an educational program for preschool children) and "K-TV" (an issues-oriented studio participation program directed at children of elementary school age) were regular weekly series.

69. Finally, education was addressed during WMAR-TV's regular news broadcasts. On September 3, the noon, 5 p.m. and 6 p.m. newscasts all carried reports about the upcoming school year. And September 16 marked the inaugural report of a new weekly series reporting on education during the noon and 5 p.m. newscasts. This series was planned prior to September 3, 1991. The first report examined a school for expectant teenage mothers and latch-key children. See Attachment J.

● Economic Development

70. A second example of WMAR-TV's responsiveness to ascertained issues related^d to the community's concern about ✓ economic development. This issue was addressed primarily through special reports within regular WMAR-TV local news broadcasts. On August 8 and 9, 1991, a two-part series profiling the National Aquarium in Baltimore was broadcast during four of WMAR-TV's five daily newscasts. The series examined a number of issues related to the Aquarium on its tenth anniversary, including its economic impact on Baltimore. From August 22, 1991 through September 2, 1991, the regular news broadcasts contained reports about the Maryland State Fair, including profiles of the participants and an examination of the economic impact of the Fair on the State's economy. From September 19 through September 22, 1991, WMAR-TV broadcast a three-part series during the 5 p.m., 6 p.m., and 11 p.m. newscasts reporting on the Baltimore City Fair, including complete coverage of the Fair, profiles of the participants and the neighborhood organizations sponsoring booths at the fair, and the economic impact of the Fair on the City. This fair is an annual event that has received news coverage each year. In July, WMAR-TV also broadcast an editorial about a report by the Greater Baltimore Committee that advocates^d building a stronger ✓ regional economy through revising the public school curriculum to teach the skills needed in today's marketplace.

● Environmental Concerns

71. WMAR-TV responded to ascertained concerns about environmental issues in a number of ways. First, environmental issues were addressed during the daily newscasts. On July 1, 1991, for example, the 5 p.m. news program contained a special report on Baltimore's expansion of its recycling program.

72. Environmental concerns also were addressed in programs directed at children under age sixteen. The cartoon program "Captain Planet," which teaches children the importance of recycling, energy conservation, and responsible consumerism, was broadcast weekly on WMAR-TV during the Renewal Period. "Earth Journal," a documentary-style program that is accompanied by a written activities guide available to middle and high school classes, was broadcast twice on WMAR-TV during the Renewal Period.

● Race Relations/Minority Concerns

73. WMAR-TV's broad-based programming response to issues of community interest also is evidenced by its approach to race relations/minority concerns. First, both of WMAR-TV's regular public affairs programs dealt with this issue. The July 27 and 28 edition of "Front Page" featured organizers of an upcoming African-American ("AFRAM") Festival and previewed the event. The August 3 and 4 edition of "Front Page" featured representatives from Alpha Phi Alpha, one of the largest African-American fraternities in the United States, who discussed moving the fraternity's headquarters to Baltimore.

The August 11 edition of "2 The Point" profiled an effort to restore the first African-American cemetery in Baltimore. And the September 14 and 15, 1991 edition of "Front Page" featured coverage of a conference on African-American business, coverage that was planned prior to September 3.

74. The second way in which this issue was addressed was in a five-part series during the 5 p.m., 6 p.m., and 11 p.m. editions of the news from July 31 through August 4. The series profiled the different groups being honored at the 1991 AFRAM Festival.

75. Third, race relations/minority concerns continued to be the subject of regular PSA's, including announcements sponsored by The National Conference of Christians and Jews, BLEWS, and The National Institute Against Violence and Prejudice.

76. Finally, on September 19 and 20, 1991, WMAR-TV broadcast an editorial urging the Baltimore County Council to amend Title 19 of the Court Code to include protection from discrimination based on sexual orientation. See Attachment H.

● Homelessness

77. WMAR-TV's response to the ascertained issue of concern about homelessness shows^{ed} its flexibility in finding the best type of programming to address the ascertained issue. To address concerns about homelessness, WMAR-TV incorporated this community issue into its broadcast coverage of a popular sporting event. On July 20, 1991, as part of its broadcast of

a Baltimore Orioles baseball game, WMAR-TV broadcast "Hits for the Homeless," an event sponsored by the station and the Orioles Wives to raise money for Action for the Homeless, a non-profit organization dedicated to informing the public about the issue of homelessness. Before the broadcast, on July 18 and 19, a WMAR-TV editorial highlighting "Hits for the Homeless" aired four times.

● Government Affairs/Legislation and Redistricting

78. Throughout the summer and fall of 1991, WMAR-TV broadcast a series of programs designed to address community concerns over government affairs, and the related issue of redistricting. On July 2, 1991, during the 5 p.m. news program, WMAR-TV broadcast a report on congressional redistricting in Maryland and the developing controversy over the proposed redistricting. On July 3 and 4 and August 8 and 9, WMAR-TV broadcast two different editorials a total of eight times encouraging voter registration. On August 28 and 29, 1991, an editorial criticizing the proposed redistricting plan was broadcast four times. Finally, the September 14 and 15, 1991 edition of "Front Page" focused on several of the proposed redistricting plans for Maryland. Ordinary business practice was to plan this program several weeks in advance, so that this topic normally would have been selected prior to September 3. This was particularly likely here because, as noted above, redistricting was not a new issue.