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Donna A. Bradshaw

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TRANSCRIPT OF PROCEEDINGS

DEC - 1 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

IN THE MATTER OF:

MM DOCKET NO. 93-94

**SCRIPPS HOWARD BROADCASTING COMPANY
and
FOUR JACKS BROADCASTING, INC.
Baltimore, Maryland**

**DATE OF HEARING: November 10, 1993
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In the matter of:

SCRIPPS HOWARD BROADCASTING COMPANY
and
FOUR JACKS BROADCASTING, INC.

Baltimore, Maryland

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The above-entitled matter came on for hearing pursuant to Notice before Judge Sippel, Administrative Law Judge, at 2000 L Street, N.W., Washington, D.C., on Wednesday, November 10, 1993, 9:30 a.m.

APPEARANCES:

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On behalf of Mass-Media Bureau:

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<u>Witness</u>	<u>Direct</u>	<u>Cross</u>	<u>Redirect</u>	<u>Recross</u>
Terry Shroeder				
By Mr. Howard	843		897	
By Mr. Masters		844		900
By Mr. Zauner		895		

Hearing began: 9:30 a.m. Hearing Ended: 11:20 a.m.

P R O C E E D I N G S

1
2 JUDGE SIPPEL: We're on the record. I have nothing
3 of a preliminary nature this morning. Anybody have anything?
4 Hearing nothing then, Mr. Howard will you call your next
5 witness, please?

6 MR. HOWARD: Yes, we call Terry Shroeder to the
7 stand.

8 JUDGE SIPPEL: Would you raise your right hand, sir?
9 Please be seated. Would you just state your, your full name
10 and your current resident address, please?

11 MR. SHROEDER: Terry Shroeder, 8131 Village Drive,
12 Cincinnati, Ohio.

13 JUDGE SIPPEL: And I'm going to, I'm going to
14 caution you at this point with respect to sequestration. The
15 testimony that you're about to give today is not to be
16 discussed with any of the other witnesses on behalf of Scripps
17 Howard until after the Scripps Howard case is completed.

18 MR. SHROEDER: I understand.

19 JUDGE SIPPEL: All right. Mr. Howard?

20 MR. ZAUNER: Your, Your Honor, in that regard, we
21 have a gentleman who just entered the room and I'm not sure
22 who he is.

23 MR. HOWARD: He's a partner in my law firm --

24 MR. ZAUNER: Okay. Thank you. I have no problem
25 then. Okay. I was afraid it might be somebody who might

1 be -- well, this is being policed very well.

2 JUDGE SIPPEL: Mr. Howard, you may proceed, sir.

3 Whereupon,

4 TERRY SHROEDER

5 having first been duly sworn, was called as a witness herein
6 and was examined and testified as follows:

7 DIRECT EXAMINATION

8 Q Do you have any corrections that you would like to
9 make initially to your --

10 A Yes, there are three minor corrections.

11 Q I'm handing you a copy of your testimony --
12 submitted into evidence. Tell the court reporter please about
13 the corrections.

14 A In paragraph number one the Zip Code should read
15 45242.

16 Q All right. The reporter will note that.

17 A Second page, paragraph four, I would like to strike
18 the words in the first sentence, "Is now, is now and -- "
19 what's happened there is at the point of the license term it
20 was 80.4 percent but earlier this year E.W. Scripps purchased
21 additional stock that has changed that percentage. So, now
22 the percentage ownership is larger than 80.4 percent but
23 through the license term it was still 80.4.

24 Q All right.

25 A And the last --

1 Q The reporter will note that change.

2 A The last correction is in paragraph five, the fourth
3 line from the bottom on page 2, the word "manager" is spelled
4 -- misspelled, general manager, insertion of an A.

5 JUDGE SIPPEL: All right. Anything else?

6 THE WITNESS: That's all.

7 JUDGE SIPPEL: Anything more, Mr. Howard?

8 MR. HOWARD: No, Your Honor.

9 JUDGE SIPPEL: All right. Is he tendered for cross-
10 examination at this time?

11 MR. HOWARD: Yes, Your Honor.

12 JUDGE SIPPEL: Ms. Schmeltzer?

13 MS. SCHMELTZER: Mr. Masters will be conducting
14 cross-examination.

15 JUDGE SIPPEL: Mr. Masters?

16 MR. MASTERS: Thank you very much.

17 CROSS-EXAMINATION

18 BY MR. MASTERS:

19 Q Mr. Shroeder, good morning. My name is Greg Masters
20 and I'm here on behalf of Four Jacks Broadcasting this
21 morning. Are you on any medication today?

22 A No, I'm not.

23 Q Is there anything that would prevent you from giving
24 full and accurate testimony today?

25 A No, there isn't.

1 Q What is your present position with Scripps Howard
2 Broadcasting Company?

3 A Vice president.

4 Q And is that a corporate office?

5 A Yes, it is.

6 Q When did you become vice president of Scripps
7 Howard?

8 A The title of vice president was given to me April of
9 '93. Prior to that I was vice president of administration.

10 Q Okay, and you were vice president for administration
11 during what period of time?

12 A Early-'89 through '93.

13 Q So, during what's been referred to in this
14 proceeding as the renewal period, May 30th, 1991, through
15 September 3rd, 1991, you were vice president for
16 administration of Scripps Howard. Is that correct?

17 A That's correct.

18 Q Is it correct that there were no material
19 differences in your responsibilities as vice president of
20 administration and your later position as vice president?

21 A That's correct.

22 Q Are you presently a director of Scripps Howard?

23 A No, I'm not.

24 Q Have you ever been a director of Scripps Howard?

25 A No, I have not.

1 Q Since Scripps Howard purchased WMAR on May 30th of
2 '91 and at all times since is it correct that you have been
3 based at Scripps Howard's corporate headquarters in
4 Cincinnati?

5 A Yes, it is.

6 Q During the period May 30th of '91 through September
7 3rd of '91, were there other vice presidents of Scripps
8 Howard?

9 A Yes, there were.

10 Q How many vice presidents were there?

11 MR. ZAUNER: Objection. Relevancy, Your Honor.

12 JUDGE SIPPEL: Mr. Masters?

13 MR. MASTERS: Your Honor, I think this is being
14 asked for background purposes and also to get a handle on Mr.
15 Shroeder's responsibilities vis-à-vis other folks at Scripps
16 Howard so I think it's directly relevant in that sense.

17 JUDGE SIPPEL: All right. I'll, I'll overrule the
18 objection and permit a few questions along these lines. Go
19 ahead, Mr. Masters.

20 BY MR. MASTERS:

21 Q Okay. How many vice presidents at Scripps Howard
22 were there?

23 A Five in total.

24 Q And can you identify those vice presidents and their
25 titles?

1 A Yes, we had a vice president of sales whose name was
2 Clint Pace, a vice president of engineering, Warren Happel, a
3 general vice president of Ken Lowe, myself which would have
4 been vice president of administration at the time. And then
5 we also had a -- it was vacant during the time but the
6 position exists for vice president of news.

7 Q Now, is it fair to say that your role as the vice
8 president of administration was largely of a budgetary and
9 financial nature?

10 A Largely, if, if you mean more than 50 percent, yes.

11 Q Okay. Among the vice presidents that you just
12 identified, were you the one primarily responsible for the
13 budgetary financial operation of the broadcasting stations?

14 A Yes.

15 Q Do you have a copy of your direct testimony in this
16 proceeding in front of you?

17 A Yes, I do. There is no --

18 Q And this would be Scripps Howard Exhibit 1.

19 A I have no exhibits for this -- I mean I have no
20 exhibits attached to this testimony, my testimony.

21 Q You have the testimony itself in other words in
22 front of you?

23 A Yes.

24 Q That's fine. Let me direct you to page SH-1-2 of
25 that testimony, and specifically to paragraph 5 where you say,

1 "As vice president of administration my responsibilities
2 included administration of the budget process, financial
3 matters, personnel matters and Equal Employment Opportunity
4 matters for Scripps Howard." I want to focus for a second on
5 the words "personnel matters." What aspects of personnel were
6 you responsible for?

7 A It would be the administration of personal service
8 contracts, the approval of our manpower levels at the
9 stations, what our staffing levels would be at the particular
10 stations. It would include employee benefit matters, employee
11 salary increases, any benefit or compensation matter or policy
12 matter related to the employees.

13 Q Okay. So, basically, in terms of personnel matters,
14 is it fair to say that personnel -- that you were responsible
15 for compensation and contract matters with respect to
16 personnel?

17 A One of the areas, yes.

18 Q Did you have any responsibility for hiring and
19 firing employees at the broadcast stations?

20 A No, I did not.

21 Q What aspects of Equal Employment Opportunity matters
22 were your responsibility?

23 A Those responsibilities were in two different areas.
24 One was compliance with the FCC EEO requirements of our
25 license. And the other is a more stringent EEO Affirmative

1 Action Program for Scripps Howard and the implementation and
2 ensuring that both of those were properly used at the station.

3 Q Do you have any responsibilities in terms of the
4 programming in the Scripps Howard stations?

5 A Direct responsibility, no. But I, I did have input
6 through my association with other people on the staff. And
7 the fact that programming has a financial implication I was
8 involved in it.

9 Q Okay. Did -- in terms of the programming, was your
10 primary responsibility in terms of programming purchase
11 contracts for the stations?

12 A Not necessarily. The way you phrase it make it
13 sound like it's after the fact. That would indeed be part of
14 it after the fact, but also involved in the pre-decision
15 situation evaluation programs, which we would select, the
16 sales models associated to those, what we expected to be the
17 performance of the stations, and how they fit into the overall
18 schedule of the station.

19 Q And we're talking here primarily about entertainment
20 programs. Is that correct?

21 A No, also news. News has a heavy financial impact on
22 the station so if we were starting up a newscast I would be
23 involved in the financial impact and the expected performance
24 of, of the newscast.

25 Q Um-hum. So, you primarily looked at financial

1 impact of programming decisions on the stations and on the
2 company. Is that correct?

3 A I did, but, you know, I've been in broadcasting for
4 20 years and I, I -- over that 20 years I've gathered a lot of
5 knowledge outside the financial impact. I've also worked at
6 stations, managed stations and I find it difficult to have an
7 opinion regarding the performance of a program to keep my
8 mouth shut, so I do get outside the financial area.

9 Q Okay. Let me direct your attention to paragraph 14
10 of your testimony, and I'm at the bottom now of page SH-1-7.
11 And you say here, "As to FCC requirements when questions arise
12 or guidance is needed on FCC procedures, stations are
13 instructed to contact outside counsel directly for advice."
14 And then continuing on to SH-1-8 you say, "I served as the
15 general coordinator of this process when appropriate." Could
16 you explain in some more detail how that works?

17 A For instance, if a station had a question regarding,
18 let's for an example take the regulations involved with
19 political advertising, or it could be anything -- I'm just
20 using it as an example. Normally, the general manager would
21 place a call to me saying, you know, what -- asking for advice
22 on what direction to take, who at Baker & Hostetler should
23 they talk to for this, or what is being done at the other
24 stations. And normally I direct him to the proper counsel at
25 Baker & Hostetler, Ken Howard or Don Zeifang during this

1 period.

2 Q Um-hum. So, you're basically an intermediary
3 between the stations and counsel for the corporation. Is that
4 correct?

5 A Right. By far, I'm not an expert in the FCC
6 requirements. I basically -- more of a traffic cop directing
7 them to the, to the expertise.

8 Q Okay. Now, the period May 30th, '91 to September
9 3rd, '91, who did you report to?

10 A Richard Janssen who was the president of the
11 broadcast company.

12 Q And is it correct that Mr. Janssen is no longer the
13 president of the broadcast company?

14 A That's correct.

15 MR. HOWARD: Objection, Your Honor. Is this
16 relevant to the --

17 JUDGE SIPPEL: Well, it was in the testimony.

18 MR. HOWARD: Yes --

19 JUDGE SIPPEL: So, I assume that --

20 MR. HOWARD: -- then it's redundant and it's
21 covering grounds that's already been covered in the testimony.

22 JUDGE SIPPEL: Well, that's what cross-examination
23 sometimes does.

24 MR. HOWARD: Yes, Your Honor.

25 JUDGE SIPPEL: Overruled. Go ahead, Mr. Masters,

1 | you're doing fine.

2 | BY MR. MASTERS:

3 | Q Is it correct that Mr. Janssen is no longer the
4 | president of Scripps Howard Broadcasting Company?

5 | A Yes.

6 | Q Who do you report to now?

7 | A Frank Gardner. He's executive vice president.

8 | Q He's executive vice president. Did the general
9 | managers of the Scripps Howard television stations report to
10 | you?

11 | A No, they did not.

12 | Q Are you the person at Scripps Howard headquarters
13 | who reviews pleadings filed in this case?

14 | MR. ZAUNER: Objection. Relevancy.

15 | JUDGE SIPPEL: Well, it has to do with this case.
16 | It certainly is -- it's, it's a narrow question. I'd be more
17 | concerned about what the follow-up question would be. Did you
18 | want to make a --

19 | MR. HOWARD: Your Honor, there's no showing that
20 | there's only one person at Scripps Howard that reviews the
21 | pleadings in this case and so the question is assuming facts
22 | that are not in evidence.

23 | JUDGE SIPPEL: Well, I think that it's more --

24 | MR. MASTERS: I can set that up another --

25 | JUDGE SIPPEL: Let me have a further, let me have a

1 -- let me have a further proffer on this. Where, where --
2 what is your theory of relevance on --

3 MR. MASTERS: My theory of relevance is simply to
4 background and again narrowly focus to this case who is the
5 person at Scripps Howard who is following this case and who is
6 reviewing it from the corporate department. I don't intend to
7 go very far.

8 MR. ZAUNER: I, I renew my objection based upon that
9 explanation.

10 MR. HOWARD: I join the objection.

11 JUDGE SIPPEL: I'll sustain the objection, but I
12 would like to know whether or not you do play -- well, no,
13 I'm, I'm not going to, I'm not going to pursue that. Go
14 ahead. Next question.

15 BY MR. MASTERS:

16 Q Now, you said a moment ago that you had in front of
17 you your testimony in the proceeding but no exhibits to it.
18 I'm now going to refer you to one of the attachments to your
19 testimony.

20 JUDGE SIPPEL: You now have a, another set?

21 THE WITNESS: I believe so, yes, Your Honor.

22 JUDGE SIPPEL: A complete deck.

23 BY MR. MASTERS:

24 Q If you would, Mr. Shroeder, would you turn to
25 Attachment A?

1 JUDGE SIPPEL: Excuse me. There is one attachment
2 that is missing. Attachment O is missing.

3 MR. MASTERS: I'm not sure there was an
4 Attachment --

5 THE WITNESS: Okay. Well, I made reference to it in
6 my testimony, that's why -- I, I believe it, it was attached
7 to Emily's testimony. I don't have that in front of me just
8 so you're aware.

9 BY MR. MASTERS:

10 Q Okay. I understand. You have Attachment A in front
11 of you then?

12 A Yes, I do.

13 Q Now, this is a memo dated May 22nd, 1991, and I
14 notice that your name is not one of the two at the top. Did
15 you write this memo?

16 A No, I did not.

17 Q Did you have any involvement in drafting the memo?

18 A Drafting the memo, no, but there is additional
19 explanation to that. I did talk to Ken Lowe upon his return
20 from the station we did talk about elements that he was
21 putting in the memo to --

22 Q Um-hum. What elements of this memo did you talk to
23 Mr. Lowe about?

24 A Looking over this memorandum, there is, there is
25 nothing in here which I don't think was news to me once I saw

1 the memorandum. I think all the areas of this memo I talked
2 to Ken Lowe about prior to him drafting the memo.

3 Q Let me refer you to paragraph 8 of your testimony.
4 Now we're back in the body of your testimony. Specifically,
5 on page SH-1-4. There is a sentence that reads, "Also, in
6 advance of the purchase both Richard Janssen and I reviewed in
7 person the station's managerial staff and the policies and
8 procedures in effect there." Now, what was your role
9 personally in doing this?

10 A Well, in advance of the, of the purchase I had two
11 visits to the station in which I met the, the managerial staff
12 of the station, had individual discussions with them, was able
13 to review during the due diligence process the policies and
14 procedures that were in effect at the station prior to
15 purchase. And since we started our purchase process in 1990,
16 during that almost year period prior to the actual acquisition
17 of the station, I got to know the strengths and weaknesses of
18 many of the managers.

19 Q What policies and procedures specifically did you
20 review?

21 A Well, quite a, quite a few. We -- off the top of my
22 head here, we, we reviewed personnel matters, contracts with
23 individuals including that of the general manager. Included
24 employee benefits, included sales policies and sales
25 philosophies of how they operate, their, their station from a

1 marketing stand point. Reviewed promotion activity of the
2 station, what levels of promotion spots they had. Reviewed
3 their capital expenditure policy and what type of expenditures
4 or purchases they were making at the station prior to
5 acquisition and what needs are maybe at the station at the
6 time that we were to buy the station. Looked into FCC
7 matters, compliance with FCC regulations. Programming, what
8 standards or what their programming schedule was on the
9 station at the time and any areas in which they saw they, they
10 would like to expand in that area. In general, covered
11 policies and procedures in quite a few areas either in person
12 at the station during visits or in phone calls during that
13 period. Also, policies and procedures, also checked out the
14 reputation of the station in management within the market.

15 Q Now, you gave me a pretty long list there. Are
16 these all things you yourself did as opposed to someone else
17 at Scripps Howard?

18 A I did these but not solely did these. Other people
19 did similar reviews of some of the same overlapping areas.

20 Q Well, my question is, the list that you just gave
21 me, you played a role in examining all of those areas. Is
22 that correct?

23 A Correct.

24 Q Prior to the purchase of WMAR by Scripps Howard, did
25 you talk with Emily Barr on a face-to-face basis?

1 A Yes.

2 Q About how many times, if you can recall?

3 A I only visited the station twice so I only had
4 opportunity of meeting her face-to-face twice.

5 Q Were these in group meetings or were these solo one-
6 on-one's?

7 A Both.

8 Q What, what did you discuss in these meetings with
9 Ms. Barr?

10 A General operations, her responsibilities in the
11 station, the level of delegation that Arty Kleiner gave her in
12 the day-to-day operations. Just her role as how it fit, fit
13 into the WMAR management team.

14 Q Prior to the purchase of WMAR by Scripps Howard, did
15 you have face-to-face meetings with Arnold Kleiner?

16 A Yes.

17 Q And these were on your two visits to the station?

18 A Correct.

19 Q And what was discussed in those meetings?

20 A A wide variety of subjects basically corresponding
21 with the policy and procedure list I gave you earlier. All
22 areas of operation of the station; his critique of various
23 department heads of the station and his philosophy of how the
24 station was run under the current owner.

25 Q Let me direct you to paragraph 10 of your testimony.

1 First sentence of that paragraph says, "During the renewal
2 period I visited the station on May 31st, 1991 and met with
3 the general manager and department heads to discuss station
4 employee matters." What station employee matters were
5 discussed?

6 A Well, that was the first day of ownership of WMAR by
7 Scripps Howard and when you acquire a new station there is
8 quite a bit of fear though usually unfounded that a lot of the
9 employees are going to lose their jobs, there's a lot of
10 changes in the works that the new owner is going to come in
11 and just change everything the way it was done before, and
12 this is a station that had had numerous ownership changes over
13 the preceding 10 years. What -- our main -- my main purpose
14 there was -- is to assure Arnie Kleiner and his management
15 team that we were pleased with the way they were operating the
16 station, that there were no employees who were going to lose
17 their jobs because of being acquired by Scripps Howard, and
18 that we were interested in improving the overall performance
19 of the station, building upon what they had already
20 accomplished.

21 Q Did you talk about any employee benefit plans under
22 Scripps Howard?

23 A Yes. Got into the, the insurance area and the new
24 insurance and health insurance aspects that Scripps Howard
25 would offer to the employees.

1 Q I would like to put in -- let me ask you a question
2 first. Do you remember being deposed by Ms. Schmeltzer, the
3 lady beside me, on July 13th, 1993?

4 A Yes.

5 Q I would like at this point to put in front of you a
6 copy of your deposition. I'm also providing a copy to the
7 Judge and we even made one for the Bureau today.

8 MR. ZAUNER: It's nice to be included. Thank you.

9 MR. HOWARD: You assumed we would have one?

10 BY MR. MASTERS:

11 Q I did. Now, Mr. Shroeder, let me direct your
12 attention to page 55 of your deposition, and let me direct you
13 specifically to line 17 of that page. You were asked the
14 question, "When was the next time after May 30th that you
15 visited the station?" And your response was, "June or July.
16 I don't recall. We were going over benefits, insurance
17 changes, payroll changes for the employees. Quite a few
18 employees would have questions as you would think, what's the
19 new owner doing in this situation, things of that nature, a
20 lot of health insurance type of issues." And my question to
21 you is, is the meeting that you said occurred in June or July
22 in this deposition the meeting to which you were referring to
23 in paragraph 10 as occurring on May 31st?

24 A Yes, it is.

25 Q Okay, and is your testimony on page 55 and 56, the

1 | lines I just read in your deposition --

2 | A Yes, it is.

3 | Q -- is that accurate testimony?

4 | A Yes, it is.

5 | Q And while you have your deposition in front of you
6 | let me draw your attention to line 17 of page 56.

7 | MR. HOWARD: Your Honor, may I -- I object to this
8 | line of questioning. I don't know what the purpose of this
9 | inquiry is. There's not -- there's no inconsistency shown,
10 | there's -- we're just burdening --

11 | JUDGE SIPPEL: Well, I'm about --

12 | MR. HOWARD: -- the record with additional
13 | information on the same point. I mean, we just completed one
14 | aspect of it and there was absolutely nothing that furthered
15 | this case's -- the decision-making in this case from that last
16 | inquiry.

17 | JUDGE SIPPEL: Well, that, that can't always be the
18 | standard for ruling on objections.

19 | MR. HOWARD: I don't understand the purpose of --

20 | JUDGE SIPPEL: I, I understand --

21 | MR. HOWARD: -- I don't understand your -- the --

22 | JUDGE SIPPEL: -- I understand your objection, I
23 | understand your objection. What's the --

24 | MR. MASTERS: Well, the, the purpose of the first
25 | segment of deposition testimony was to clear up what I saw as

1 an inconsistency in terms of the time that this particular
2 employee benefit meeting occurred. And also the time when he
3 visited the station, in other words. He said in his
4 deposition that it occurred in June or July, he's saying here
5 that it happened on May 31st. I was just trying to find out
6 whether that was the same meeting.

7 MR. HOWARD: Specifically, he said in his
8 deposition, "June or July. I don't recall." Now, that's --
9 clearly he was unclear as to the exact time.

10 JUDGE SIPPEL: Yeah, but that's a different month
11 and day.

12 MR. HOWARD: Yes.

13 JUDGE SIPPEL: Granted, June 1 could be one day off
14 of June 31st, but that's --

15 MR. HOWARD: But the relevance of the distinction
16 still is --

17 JUDGE SIPPEL: It's the weight of the distinction.
18 I mean, it's, it's -- to the extent that it's an
19 inconsistency, it's, it's an inconsistency to the extent that
20 it makes any difference, something else again. But he
21 certainly is entitled to ask this question. I think it's
22 going to be a lot faster if he asks it and we'll move on. I'm
23 going to overrule that objection. But I am more concerned
24 about getting into this, this line of, of, of questions about
25 a benefits meeting, a meeting on -- I mean, what does that

1 have to do with what we're trying --

2 MR. MASTERS: Well, Your Honor, the witness has a
3 lot of testimony on meetings that occurred at the station
4 during the renewal period. I'm trying to get at what sorts of
5 meetings these were and the matters that were discussed at the
6 meetings.

7 JUDGE SIPPEL: I see. I see. I, I, I see. All
8 right. I -- you're -- within, within reasonable limits I'll
9 permit this.

10 MR. MASTERS: Thank you, Your Honor.

11 JUDGE SIPPEL: You may proceed.

12 BY MR. MASTERS:

13 Q Let me direct your attention to page 56 of your
14 deposition. On line 17, you were asked the question, "Did you
15 make any other trips to WMAR-TV between May 30th and September
16 3rd?" Your answer was, "I don't believe so." Does that
17 testimony remain accurate?

18 A No, it doesn't. Elsewhere in the deposition, there
19 on line 22 and also in the beginning of the following page I
20 did state that, you know, I'd have to check my calendar, I
21 didn't do that in preparation for the deposition. So, I
22 wasn't really focusing in on calendar dates when I did my
23 deposition. My testimony is correct on my visits.

24 Q And that testimony is that in fact you did visit the
25 station a second time?

1 A Correct.

2 Q And that meeting occurred on August 28 through the
3 30th, 1991. Is that correct?

4 A Correct.

5 Q Did this meeting occur on all three days, 28th, 29th
6 and 30th, or one or two of those days?

7 A The -- I flew in the afternoon of the first day. I
8 was at the station all three days. Primarily, the second day
9 was the complete day at the station.

10 Q Now, was the primary purpose of this meeting to
11 discuss budget matters at the station?

12 A Budget and operational matters. It's hard to
13 separate the budget from operations.

14 Q Um-hum. What aspects of operations were discussed
15 at that meeting?

16 A Quite a few things. One of the main areas of
17 discussion was the capital expenditure requested in budgets
18 for 1991 and also for 1992 in the areas in which the station
19 felt that they needed additional capital expenditures. The
20 prior owner had really not invested a great deal of capital
21 during the two years that the station was on the market and
22 the station needed the replacement of key equipment and also
23 additional equipment to stay in touch with technology and we
24 wanted to make that investment. So, in that area the primary
25 purpose was to give approval to move forward for '91