

1 you, "What are your assigned duties as vice president?" You
2 answered on line 5, "There are no specifically assigned
3 duties," is that correct?

4 A Right.

5 Q And then I asked you, "What are your assigned duties
6 as assistant treasurer?" and you answered, "Assist the
7 treasurer as needed," is that correct?

8 A That's correct.

9 Q And then on line 14, I asked you, "When was the last
10 time you were required to give him any assistance?"

11 Answer: "Perhaps at a board meeting to take notes."

12 Question: "Do you take notes at board meetings?"

13 The answer: "Yes, generally speaking."

14 Is it the job of the treasurer or the assistant treasurer to
15 take notes at board meetings?

16 A No.

17 Q Now, did, did the Sinclair board meet in 1993?

18 MR. LEADER: Judge, I'm going to object. That is
19 irrelevant.

20 JUDGE SIPPEL: You say it's not relevant?

21 MR. LEADER: No. Sinclair isn't an applicant here.

22 JUDGE SIPPEL: Well, again, I'd like -- the, the --
23 I -- it's, it's no mystery as to what's being probed here, and
24 that is in terms of how the Smith brothers are spending their
25 time with respect to all these ongoing businesses.

1 MR. LEADER: Well, but, he's already asked and
2 answered that several times. I --

3 JUDGE SIPPEL: Well, this is --

4 MR. LEADER: I, I -- all right, I withdraw the
5 objection, Your Honor.

6 JUDGE SIPPEL: Mr. Greenebaum?

7 BY MR. GREENEBAUM:

8 Q Did Sinclair's board meet in 1993?

9 A I believe it met in February of 1993, yeah. Yes.

10 Q And has it met in the interim for any reason other
11 than the annual meeting in February?

12 A No, not that I'm aware of.

13 Q All of your corporations are scheduled to have their
14 board meetings in February of each year, right?

15 A That's essentially correct.

16 Q Now, Sinclair owns and operates a variety of sta-
17 tions, does it not?

18 A Correct.

19 Q And what involvement have you had with the stations
20 that are owned and operated by Sinclair?

21 A As vice president, director, and assistant
22 treasurer.

23 Q And in connection with your employment at Sinclair,
24 have you been involved in the hiring and firing for a station
25 personally?

- 1 A Yes.
- 2 Q At what station and in what way?
- 3 A I've been involved in hiring and firing.
- 4 Q At what station and in what way?
- 5 A In hiring and firing at all stations.
- 6 Q At all stations.
- 7 A Yes.
- 8 Q Now, on page 35 of your deposition, line 8, I asked
- 9 you have you been previously -- "have you previously been
- 10 involved in hiring and firing for a station personally?" The
- 11 answer was, "Yes." Question: "What station and in what way?"
- 12 Answer: "I've been involved in the station in Baltimore, the
- 13 station in Columbus, and the station in Pittsburgh, and also
- 14 the station in Tampa and the station in Annapolis."
- 15 A Um-hum.
- 16 Q So what station were you involved in, in Annapolis
- 17 and when?
- 18 A Well, that's -- it's a misprint. Indianapolis.
- 19 Q Okay. So you have taken an active role in all of
- 20 the stations that Sinclair participates in --
- 21 A With respect to hiring and firing, absolutely.
- 22 Q And have your brothers helped you in that as well?
- 23 A Sure.
- 24 Q So they've been involved in that.
- 25 A Yes.

1 Q Okay, what other things have you done in connection
2 with these stations owned and operated by Sinclair on an
3 ongoing basis?

4 A Whatever is needed.

5 Q And what does that mean? What is needed in owning
6 and operating three television stations --

7 A Well, I might fix the --

8 Q -- and the related activities that flow from --
9 therefrom or in connection therewith?

10 A Maybe discussions with the general managers; maybe
11 discussions with the sales manager; maybe evaluation of the
12 health plan company; maybe evaluation of the retirement plan
13 for the company; things like that.

14 Q So, I take it operating -- well, strike that. So,
15 so there are ongoing issues that have to be explored,
16 discussed, and decisions made on a regular basis, is that
17 correct?

18 A Yes.

19 Q And you participate with all of your brothers in
20 that regard?

21 A Yes.

22 Q And how much time do you spend in connection with
23 these subsidiary stations on a weekly basis in connection with
24 your employment at Sinclair?

25 A We're fortunate to have extremely good personnel,

1 | which is always your objective when you're in a company. I
2 | would say --

3 | Q Well, let's talk about Chesapeake Television, Inc.

4 | MR. LEADER: He still hasn't answered that question.

5 | MS. SCHMELTZER: Let him answer the question.

6 | MR. GREENEBAUM: I'm sorry, I thought he --

7 | MR. LEADER: No, he, he --

8 | MR. SMITH: I, I was just saying that we're
9 | fortunate to have very good personnel so the actual -- once
10 | again, I've never sat down and said, "Well, this is exactly 1
11 | hour, or this exactly 3 minutes; it's 2 minutes; it's 8
12 | minutes; it's 4 1/2 minutes," but I would say, you know,
13 | several hours a week at least.

14 | BY MR. GREENEBAUM:

15 | Q And couldn't one hiring and firing decision take
16 | more than 4 hours?

17 | A Could?

18 | Q Yeah, I mean --

19 | A One hiring and firing --

20 | Q Hiring and firing people, especially firing, is a
21 | serious consequence in today's world, is it not?

22 | A Absolutely.

23 | Q And it takes time and discussion, does it not?

24 | A Absolutely.

25 | Q And how much time do you spend, have you spent, on,

1 say, a single firing.

2 A Twenty minutes, thirty minutes, I would say.

3 Q And you would discuss it with your brothers as well?

4 A Well, that would be, that would be an ongoing
5 discussion for 20 or 30 minutes, and we'd make a
6 recommendation to the general manager.

7 Q So you all --

8 A After the facts were presented by the general
9 manager.

10 Q So that the general manager in connection with
11 hiring and firing comes to you all for a decision.

12 A Yes.

13 Q And what input do you all have, say, in programming
14 the station?

15 A Absolute input.

16 Q And that requires some discussion from time to time,
17 does it not?

18 A Well, we get the feedback once again from the
19 general manager, listen to the recommendation, and make the
20 decision.

21 Q So there's a constant flow of communication between
22 you and your brothers on the one hand, and the general
23 managers at the stations on the other.

24 A Define constant.

25 Q Day to day.

1 A I would -- I'll say day to day.

2 Q How about week to week?

3 A Week to week.

4 Q Do you go as much as a week without any
5 communication by any of you with any station?

6 A Yes.

7 Q What's the longest you might go with no
8 communication between the home office and the station in any
9 respect whatsoever?

10 A Two months.

11 Q So that it could happen to any one of these
12 stations.

13 A In theory, yes. Now, once again, I -- when you --
14 when I say 2 months, I didn't sit down with a clock and punch
15 it.

16 Q It could be a month and a half, it could be 3
17 months.

18 A Sure. I'd say 2 months is probably the longest
19 we've gone without contacting them.

20 JUDGE SIPPEL: You've buried the microphone, sir.

21 MR. GREENEBAUM: Thank you.

22 JUDGE SIPPEL: Did, did we get everything up to this
23 point? She's saying yes. When, when you say a 2-month
24 period, do you mean that, that there would be no communication
25 for 2 months either from the station to you or from you to the

1 sta-- I mean, you to the -- you or your brothers to the
2 station?

3 MR. SMITH: That's correct.

4 JUDGE SIPPEL: There would just be no contact
5 whatsoever.

6 MR. SMITH: No, they would contact our chief
7 financial officer, they'd contact the accounting office, but
8 not us. They could almost go at least 3 or 4 days or I'll
9 receive contact from the accounting, accounting individual,
10 Mr. Amy.

11 BY MR. GREENEBAUM:

12 Q And do the general managers have the authority to
13 hire and fire without your approval?

14 A No.

15 Q What other things do they not have the authority to
16 do without your approval?

17 A Let me qualify that when I said hire and fire. With
18 respect to sales executives, with respect to department heads,
19 generally speaking, they cannot hire or fire without our
20 input. If they hire temporary people, secretaries, people
21 that are assistants to other individuals and don't have a
22 major capacity within the station, especially the sales
23 department, they don't need our approval for that.

24 Q They certainly don't have the authority to borrow
25 money without your approval.

1 A Absolutely not.

2 Q What else do they not have the authority to do
3 without your approval?

4 A For instance?

5 Q I'm asking you. I don't know.

6 A Well, they run an autonomous operation. They
7 essentially do, with the exception of hiring and firing execu-
8 tives within their, their operation -- they don't have the
9 authority to spend money.

10 Q They can't buy programming without your approval.

11 A That's right.

12 Q They can't make a deal with a syndicator without
13 your approval.

14 A They do -- they can negotiate the deal but not
15 ultimately sign off on it. We have to sign off on it.

16 Q So executive decisions would be made by you all.

17 A That's correct.

18 Q And, and as I understand it, they would call or
19 write and whoever got it would deal with the problem, is that
20 correct?

21 A Essentially, that's correct, with the exception,
22 generally, in programming. David usually handles that.

23 JUDGE SIPPEL: We're at a quarter of the hour. This
24 is when we normally take our breaks. The witness has been on
25 the stand since 10 o'clock. We'll be in recess until 11

1 o'clock.

2 (Off the record from 10:45 a.m. to reconvene at
3 11:00 a.m.)

4 JUDGE SIPPEL: Back on the record. Mr. Greenebaum?

5 MR. GREENEBAUM: Thank you, Your Honor.

6 BY MR. GREENEBAUM:

7 Q Dr. Smith, we were talking about the time you spend
8 on the subsidiary rad-- TV stations owned or operated by
9 Sinclair. Do you recall that before the break?

10 A Yes. Yes, sir.

11 Q And I believe you said you spend a couple or several
12 hours a week, something like that.

13 A Yes, sure.

14 Q Okay. Now, your office is at Sinclair, is that
15 correct?

16 A My office is at Sinclair?

17 Q Is at Sinclair, where you work.

18 A It's at 2000 West 41 -- right.

19 Q That's the offices of Sinclair Broadcast Group.

20 A Correct, um-hum.

21 Q And when you're working on Keyser or Cunningham,
22 you're also doing that at Sinclair, is that correct?

23 A Doing it in our offices, yes.

24 Q Okay. Now, and you work about 40 hours a week at
25 Sinclair more or less?

1 A More or less, yeah.

2 Q And now in the time that you're not devoting 2 or 3
3 hours a week to the subsidiary TV stations, and the minimum
4 time which I won't debate with is that you're spending on
5 Keyser and the other companies we've talked about on the
6 right-hand side of the chart, how do you make up your day at
7 work?

8 A Well, lunch is a big part of it; read the paper,
9 Baltimore Sun; read the Fortune 500 magazine; talk to the news
10 department, contact the news department, talk to people back
11 there; talk about personal matters with my brothers about,
12 about our personal lives; things like that.

13 Q Well, how big a part of the day is lunch?

14 A Couple of hours.

15 Q And do you have lunch with your brothers?

16 A Usually I have lunch with one of my brothers,
17 sometimes both of my brothers, sometimes all four of us.

18 Q Do you --

19 A Sometimes the chief, chief financial officer, yeah.

20 Q Do you all go off the premises for lunch?

21 A Oh, yeah.

22 Q And is that lunch business related?

23 A Usually just chit chat about this and that.

24 Q When the financial officer is with you, is that
25 business related?

1 A Sometimes.

2 Q And is reading the paper business related?

3 A Check the stocks.

4 Q So how much, how much time do you spend reading the
5 Baltimore Sun every day?

6 A Maybe 45 minutes or so. Once again, I haven't timed
7 it by a clock. I'm just trying to give you a reasonable
8 number here.

9 Q And how about the other magazine you said you read?

10 A I'll usually read The Wall Street Journal, also.
11 That's another 45 minutes, and then other magazines,
12 they're -- they come once a month. I may read Electronic
13 Media, Broadcasting, other periodicals such as that.

14 Q That's to keep up with your business?

15 A Yeah, um-hum.

16 Q And then you discuss what you've learned in those
17 periodicals --

18 A Yes.

19 Q -- with your brothers?

20 A Yes. At times.

21 Q Do they rely on you to do that, or do they do that
22 as well?

23 A No, they do it as well.

24 Q Hum?

25 A They do it as well.

1 Q And then you all discuss it.

2 A On occasion, yeah.

3 Q Do you ever use that stuff in your --

4 A Oh, yeah.

5 Q -- business?

6 A Oh, yeah.

7 Q So you feel that's necessary to stay current.

8 A I think it's vitally important to read the current
9 periodicals about your business, sure.

10 Q What else do you do to keep up with your business?

11 A Attend national meetings.

12 Q What meetings do you attend on an average?

13 A NAB, NATPE.

14 Q NAB and what?

15 A N-A-T-P-E.

16 Q N-A-T-P-E?

17 A Right, and NAB.

18 Q Would you tell us what those stand for, those --

19 A National Association of Broadcasters, Association
20 for Television Programming Executives.

21 Q And was there a third one?

22 A No. And there are other meetings but I, I don't
23 attend them.

24 Q And how frequently do you go to such meetings?

25 A Well, in addition to that there are -- you have to

1 go to Fox meetings every now and then, network meetings.

2 Q How often do you go to Fox or network meetings?

3 A I would say I go twice a year.

4 Q Are they out of town?

5 A Yes.

6 Q How long do you spend?

7 A A couple of days.

8 Q And how about the NAB?

9 A Usually 1 or 2 days. That's yearly.

10 Q Where is that?

11 A Various places. More recently it was San Francisco,
12 I believe.

13 Q And how long did -- was that?

14 A Couple of days.

15 Q And how about the, the other one with the
16 programming executives?

17 A A couple of days.

18 Q Where was that?

19 A New Orleans, I think, the most recent one was.

20 Yeah, New Orleans.

21 Q And did your brothers accompany you on those trips?

22 A Let's see. Generally speaking, one of my

23 brothers -- generally speaking, one or two of us will go.

24 Q And then you report back to the others what you
25 learned?

1 A Exactly.

2 Q Find those important?

3 A Yes.

4 Q What else do you do to keep up with your business,
5 if anything?

6 A That's pretty much it. That's pretty much it.

7 Q Do you remember being at a NAB meeting in Las Vegas
8 last year?

9 A Let's see. Just thinking of Las Vegas. I always
10 think about where I stay at there when I go out there. I
11 don't think I went there last year.

12 Q Do you --

13 A I think not to the NAB. Let's see, Las Vegas. No,
14 I don't remember right off the top of my head. I know I was
15 in, in Las Vegas last year two times but I don't think I was
16 there for an NAB meeting.

17 Q Well, do you remember being at a program executive's
18 meeting in San Francisco?

19 A I know there's been a meeting in San Francisco, but
20 not -- I, I think it was NAB. I think NATPE was in New
21 Orleans the last couple of times.

22 Q And what time, if any, do you devote to Channel 63?

23 A Channel 63, Inc., I would say I'd have -- about --
24 do you want a daily, weekly, monthly, yearly?

25 Q Daily would be helpful.

1 A Minimal, nothing.

2 Q How about weekly?

3 A Let's go to monthly.

4 Q All right. You can't tell me weekly, is that what
5 you're saying?

6 A Yeah, there is nothing. I would say on a monthly
7 basis, a half hour a month.

8 Q Okay. And could it be as much as a month or are you
9 sure that half an hour would be the most that you spend?

10 A What was that question again?

11 JUDGE SIPPEL: I don't think --

12 MR. GREENEBAUM: I'm sorry, I'll, I'll withdraw that
13 question.

14 BY MR. GREENEBAUM:

15 Q How about Bay Television? How much time do you
16 spend on that?

17 A Bay Television? About the same as, as Channel 63,
18 Inc.

19 Q About a half hour a month?

20 A Yeah, it's about 6 hours a year on that.

21 Q What is it that you do in connection with Channel
22 63?

23 A I'll usually fly out there and make an on-site visit
24 once a year.

25 Q And --

- 1 A Talk to the personnel.
- 2 Q And where is it located?
- 3 A Indianap-- well, it's outside of Indianapolis,
4 actually, southeast of Indianapolis.
- 5 Q And what do you do in connection with Bay
6 Television?
- 7 A Vice president, director.
- 8 Q What do you do with this half an hour?
- 9 A With Bay?
- 10 Q A month, yeah.
- 11 A Oh, I would go down there once a year and make an
12 on-site visit.
- 13 Q So that's also a 6-hour a year --
- 14 A Roughly, yeah.
- 15 Q Okay.
- 16 A It's, it's basically a down-and-back and talk to the
17 people down there for a couple of hours.
- 18 Q And, and can you, can you leave your house, go to
19 the Tampa area, wherever -- Bay Television is down there,
20 right?
- 21 A Yes, sir.
- 22 Q And do your business and get back in 6 hours?
- 23 A No, it would take me, let's see, probably 10 hours
24 transportation time.
- 25 Q So you spend at least 10 hours when you make one

1 trip, isn't that correct?

2 A Well, I was, I was thinking actually physically
3 being there and interacting with the employees, not
4 transportation.

5 Q Well, certainly when you're traveling, you're
6 traveling on business for that purpose, aren't you?

7 A Yeah, yeah. I just didn't add that to my calcula-
8 tions.

9 Q What else do you do in connection with Bay
10 Television that maybe you haven't put in the mix yet in terms
11 of calculating your time?

12 A That's it.

13 Q Well, do you do anything in connection with Bay
14 Television other than the once-a-year inspection trip?

15 A Me, personally? No, uh-uh.

16 Q Did you do any hiring and firing of Bay -- at Bay
17 Television?

18 A Not this last year, no.

19 Q But from time to time have you done that?

20 A Probably it's left to my brother Duncan.

21 Q And how about Channel 63, can you get to
22 Indianapolis and back and -- from the time you leave your home
23 to the time you return, and do your business there, in 6
24 hours?

25 A Let's see. Yeah, um-hum, about 6 hours.

1 Q And have you done anything in connection with
2 Channel 63 other than make the once-a-year inspection trip on
3 an annual basis?

4 A Really not, uh-uh. Nothing at all that requires me
5 to go out there.

6 Q How about that doesn't require you to go out there?

7 A My brother might ask me a question. Duncan or Dave
8 might say, "Well, what do you think about this?"

9 Q Now, you --

10 A I mean, I can't, I can't recall any specific
11 question they asked.

12 Q Those are separate corporations in which you have a
13 percentage interest, is that correct?

14 A Correct.

15 Q Don't you get all manner of reports as an owner of
16 that station on a regular basis?

17 A Well, those reports generally go to a certified
18 financial officer and we get copies of them.

19 Q You don't even read them.

20 A Usually with Bay Television, I don't read it; with
21 IIB, I don't read it. I will read Sinclair Broadcast Group's,
22 obviously --

23 Q What is the purpose of your annual -- I'm sorry, did
24 I cut you off?

25 A No.

1 Q Okay. What is the purpose of your annual inspection
2 visit?

3 A The purpose of the annual inspection is to go out
4 and talk to the person who's managing it, basically, to make a
5 face-to-face contact to let him know we still exist. I might
6 go over, for instance, their bonus money, or their salaries
7 maybe next year, on a person-to-person basis. Usually I won't
8 even go to the station. In Indianapolis, we'll just meet in a
9 restaurant someplace and go over it, that kind of thing.

10 Q So your -- do, do any of your brothers make inspec-
11 tion visits to any of these stations?

12 A Yeah. I mean, I'm not -- I don't go to every one
13 every year. I mean, sometimes Duncan will go, sometimes Rob
14 will go, but it's usually Duncan.

15 Q Well --

16 A And sometimes me.

17 Q Do, do all of you go to any station every year?

18 A No.

19 Q And so is, is it your testimony that the management
20 of Channel 63 and Bay Television from the perspective of the
21 owners is a once-a-year inspection trip and --

22 MR. LEADER: No.

23 BY MR. GREENEBAUM:

24 Q You're shaking your head "no," so tell me where I'm
25 wrong.

1 JUDGE SIPPEL: Finish your question.

2 MR. LEADER: I have an objection.

3 JUDGE SIPPEL: Finish your question.

4 MR. LEADER: Wait just a minute. Just -- I'm sorry,
5 we have an objection first. Well, I think it's a
6 mischaracterization of the witness' testimony. If he wants to
7 know how they're managed --

8 JUDGE SIPPEL: Well, I --

9 MR. LEADER: -- he shouldn't --

10 JUDGE SIPPEL: I'll, I'll sustain the objection. I
11 mean, I'll permit the question if he wants to -- if
12 Mr. Greenebaum wants to frame it in "would you agree that" --

13 MR. LEADER: Right.

14 JUDGE SIPPEL: -- but I, I -- otherwise I'm going to
15 sustain your objection.

16 BY MR. GREENEBAUM:

17 Q Is it -- are there -- is there more than one inspec-
18 tion trip by you or your brothers to Bay Television in any one
19 year in the last 3 years?

20 A I would say certainly not by me; certainly not by
21 Robbie; certainly not by Dave. Probably Duncan, and maybe
22 twice in a year, maybe, if anybody.

23 Q Okay.

24 A But I would say Duncan would be probably the first,
25 and then it would be twice.

1 Q So Duncan did it twice, as I understand your testi-
2 mony --

3 A I said maybe. I, I haven't kept track of his --

4 Q Assuming for the moment --

5 A Yes.

6 Q -- that Duncan has been down there once or twice --

7 A Yes, right.

8 Q -- in a year, is it your testimony that you or one
9 of your other brothers would also make a trip to the station?

10 A No, it is not.

11 Q So you don't really know who would go or when, is
12 that right?

13 A No, with respect to Bay Television, I said I know
14 Duncan goes down there at least once a year.

15 Q And you've told us you've been going, right?

16 A I've gone down there once a year for the last 2
17 years.

18 Q And it's the same thing with Channel 63, isn't that
19 correct?

20 A I've gone to Channel 63 in the last 2 years. Duncan
21 has not gone out there with me. He may have gone out there
22 once on -- by himself, I don't know.

23 Q What, if anything, do you or your brothers do so far
24 as you know to manage Bay Television other than the inspection
25 trips that you've just told us about.

1 A Well, you have understand what we have there. We
2 have a Home Shopping channel, and other than the person that
3 we have on site out there -- she basically sends all the
4 financial information to the financial people, and we really
5 have no contact with them at all.

6 Q And do the financial people report to you --

7 A Yes.

8 Q -- after they get that information?

9 A Yeah, the financial individual, or the chief finan-
10 cial officer, would report to us any information that is
11 pertinent.

12 Q And does the chief financial person or financial
13 officer report to whichever one of you he happens to find or
14 catch?

15 A Generally speaking, yes.

16 Q And then you would, or whichever one that is, would
17 advise the others.

18 A That's correct.

19 COURT REPORTER: Excuse me.

20 (Whereupon, a brief recess was taken.)

21 JUDGE SIPPEL: All right.

22 BY MR. GREENEBAUM:

23 Q Does that station offer public affair programming as
24 well?

25 A Yes.

1 MS. SCHMELTZER: Objection.

2 (Asides.)

3 BY MR. GREENEBAUM:

4 Q And what is your role in that, if any?

5 A I -- could you be more specific?

6 Q Who at Sinclair coordinates or participates in the
7 public affair programming of Bay Television?

8 MR. LEADER: I'm going to object to that because I
9 think it's irrelevant. We're, we're so far away now. I mean,
10 he's not asking about how much time this witness spends. He
11 wants to know who does another task at that station, which is
12 not an issue in this proceeding by any stretch.

13 JUDGE SIPPEL: Mr. Greenebaum -- all right, Mr. --

14 MR. GREENEBAUM: I'm trying to find out what any of
15 these brothers do any way I can and, and I believe --

16 MR. LEADER: But ask the brothers what --

17 JUDGE SIPPEL: Wait and let, wait and let
18 Mr. Greenebaum finish.

19 MR. GREENEBAUM: He, he knows when somebody is doing
20 something. I think it's just as relevant as if that person
21 told it. There may be conflict between them as well.

22 MR. LEADER: Mr., Mr. Greenebaum has just conceded
23 that he wants to know what each of the brothers do at these
24 stations, but he's asked who at the station does the public
25 affairs programming which is -- the -- there's been ample

1 testimony here that none, none of the brothers are at the
2 station.

3 JUDGE SIPPEL: Well, I don't -- I'm going to permit,
4 I, I'm going to permit -- well, let, let, let me say this
5 about the, the, the status quo here in these, these lines of
6 questions. We're trying to establish -- I'd like to see a
7 record that establishes a, a, a fairly clear picture in terms
8 of what's going on between these stations that are outside of
9 Baltimore and how they're interacting with Baltimore, so to
10 the extent that there's one or two questions to tie that in,
11 I'm going to permit it, but we're not going to go into the
12 details of other people and their programming efforts, so to,
13 to -- I partially sustain your, your objection but for the
14 time being, I'm overruling it. Go ahead, Mr. Greenebaum.

15 BY MR. GREENEBAUM:

16 Q Could you tell us who it is at Baltimore that
17 participates or coordinates the public affairs programming
18 in --

19 A For what?

20 MR. LEADER: Objection. That's not the question he
21 asked initially. He first asked -- the question that was on
22 the table and which you ruled, was concerned with
23 Indianapolis, not Baltimore. Now, we don't have any answer to
24 the question on Baltimore --

25 MR. GREENEBAUM: Well, let me finish the question.