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June 22, 1994

MEMORANDUM

RE: Testimony of Richard Miller

The following is essentially what I believe Mr. Miller will say in his oral direct testimony. This is offered as my understanding of what he will say based on my conversations with him. He has not seen or specifically endorsed or approved this memorandum, but I believe it is generally accurate.

- A. How a station convinces its advertisers to buy time; the relative importance of specialized knowledge of the format; the qualifications appropriate in considering the employment of a radio salesperson

Advertisers buy demographics: for example, age, race, gender and income. Buyers of airtime want media research data, and are generally not concerned with the minutiae of the music, such as which cellist is playing in which orchestra.

That is why specialized knowledge of the details of the format is not essential for a radio salesperson. He or she cannot hate the music, of course, and can't be stupid. He or she must know, for example, that classical music attracts people with a college education, high income, and people who travel a lot, eat out a lot, and are frequent fliers. In selling for a station with a format such as classical, the task is to persuade the advertiser that the station reaches an upscale market.

Some rudimentary familiarity with the music is helpful. For example, an advertiser might ask how long a symphony is, because he or she might want to know whether it will be interrupted by advertisements. But these things can be learned easily and quickly, and they can be learned on the job. For example, a salesperson who doesn't know very much about classical music, but is a good salesperson, might be asked to take a course on classical music appreciation at a junior college as part of his or her growth process in the job.

Federal Communications Commission

Docket No. 94-10 Exhibit No. 12

Presented by WTRCP

Disposition { Identified 6/22
Received 6/22

Rejected _____

Reporter BMC&MCH WDC

Date 6/22/94

- B. How hard or easy it is to identify and hire qualified minorities in the St. Louis radio market

If a broadcaster really wants to hire minorities, he or she will find a way to do it. These days, every major broadcast company has managed to comply with the EEO Rule and doesn't rely on excuses. For example, Blacks work in country/western stations everywhere. It doesn't matter that they might not be able to go home and talk to their friends about Conway Twitty and Dolly Parton. It's a job, and you can make money doing it.

To get Blacks to be radio salespersons, one need simply go to the ad agencies and ask the time buyers "of all the rookie salespeople who call on you, who has good potential, and might be persuaded to leave his or her job?" Or get to know Blacks who work in other media, such as newspapers, where the skills transfer easily to radio. It might not be difficult to get a good Black account executive from a daily or weekly newspaper to cross over to radio.

/dh

DH

NAACP #13

RICHARD J. MILLER
9934 LITZINGER
ST. LOUIS, MISSOURI 63124

BIOGRAPHICAL INFORMATION

- 1949 Graduated from Horace Mann School for Boys Riverdale,
New York (High School)
- 1953 Graduated Emory University BA in Social Sciences
- 1958 Acquired KXLW Radio- ST. Louis, Missouri
Served as general manager of KXLW until its sale in 1980
- 1969 Acquired KADI-FM in St. Louis
Served as general manager of KADI-FM-KJOY-JUKEBOX 96 until
its sale in 1994
- 1970 Acquired KWKI Kansas City, MO
- 1970 Acquired WMAS AM & FM in Springfield
Supervised all other radio stations and hiring,
programming, and sales policies for all stations
- 1986 Married

Federal Communications Commission	
Docket No. <u>94-10</u>	Exhibit No. <u>13</u>
Presented by <u>NAACP</u>	
Disposition	Identified <u>6/24</u>
	Received <u>6/24</u>
	Rejected _____
Reporter <u>BALBALA LORO</u>	
Date <u>6/24/94</u>	

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Federal Communications Commission	
Docket No.	94-10 Exhibit No. 13
Presented by	NAACP
Disposition	Identified 6/24
	Received 6/24
	Rejected
Reporter	BARBARA LORD
Date	6/24/94

NAAAP#14

①

Declaration of Cari O'Halloran

I, Cari O'Halloran, respectfully state as follows.

1. I am a resident of the city of Tampa in the state of Florida. I was known as Cari Perez before my marriage.

2. In 1985, I graduated from the University of Florida at Gainesville with a B.S. in Broadcast Management. While at the University of Florida, I worked as a classical music disc jockey at their noncommercial college radio station. I was also assistant to operations/station manager. In my last year at U. of Florida, I did an internship with KATZ in New York, N.Y. where I did research in the field of sales.

3. After graduating from the University of Florida, I first worked as an account executive at WTMI in Miami from 1986 to 1987. From February 1988 to February 1989, I was an account executive at KFUC. Since March 1989, I have been an account executive at several television and radio stations in Missouri and Florida.

4. In February of 1988, in my initial job search in St. Louis, one of my first interviews was with KFUC. Ten minutes into the interview I was offered a job. Although I was qualified for more lucrative jobs in the radio industry, I took the position with KFUC because of my familiarity with selling classical music as a format. A background in classical music, in itself however, is not an advantage or a needed requirement to sell radio time in this format. What is needed is a background in niche marketing and demographics so that you can target the class of individuals that the advertiser wants to reach.

5. Although I am Hispanic, I don't feel that KFUC hired me or actively pursued me for the sales position because of my

Federal Communications Commission

Docket No. 94-10 Exhibit No. 14

Presented by NMPCD

Identified 6/24

Disposition { Received 6/24

Rejected 6/24

Reporter BMCBMAA COED

Date 6/24/94

②

heritage or because they wanted to hire a minority. I feel the reason I was offered the job was my experience and proven background in sales of this particular format.

6. Before hiring me, Tom Lauher had previously hired Tom Koon and Charlotte Akin for sales positions. I quickly realized that neither of them had a background in selling commercial airtime for a radio station, much less a background in classical music. Because of my sales experience, I was able to help these inexperienced employees in learning the skills necessary to sell commercial airtime.

6. Contrary to KFUC's assertions of running a radio station where people are treated equally, during my time at the radio station, I felt that women, in general, had little chance for advancement into positions of management or authority. Also, I can never recall a black person working in sales or management for whatever reason. Nor can I ever recall a black person being interviewed for a job at KFUC.

7. I declare under penalty of perjury under the laws of the United States of America that the foregoing Declaration is true and correct to the best of my knowledge and belief.

Executed

6/22/94

Cari O'Halloran

Cari O'Halloran

NAA#4

①

Declaration of Cari O'Halloran

I, Cari O'Halloran, respectfully state as follows.

1. I am a resident of the city of Tampa in the state of Florida. I was known as Cari Perez before my marriage.

2. In 1985, I graduated from the University of Florida at Gainesville with a B.S. in Broadcast Management. While at the University of Florida, I worked as a classical music disc jockey at their noncommercial college radio station. I was also assistant to operations/station manager. In my last year at U. of Florida, I did an internship with KATZ in New York, N.Y. where I did research in the field of sales.

3. After graduating from the University of Florida, I first worked as an account executive at WTMI in Miami from 1986 to 1987. From February 1988 to February 1989, I was an account executive at KFUC. Since March 1989, I have been an account executive at several television and radio stations in Missouri and Florida.

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Presented by NARS

Identified b24

Disposition { Received b24

Rejected b24

Reporter BRANCO

Date 6/24/94

(2)

heritage or because they wanted to hire a minority. I feel the reason I was offered the job was my experience and proven background in sales of this particular format.

6. Before hiring me, Tom Lauher had previously hired Tom Koon and Charlotte Akin for sales positions. I quickly realized that neither of them had a background in selling commercial airtime for a radio station, much less a background in classical music. Because of my sales experience, I was able to help these inexperienced employees in learning the skills necessary to sell commercial airtime.

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7. I declare under penalty of perjury under the laws of the United States of America that the foregoing Declaration is true and correct to the best of my knowledge and belief.

Executed 6/22/94



Cari O'Halloran

DECLARATION OF KATHRYN WOODARD

I, Kathryn Woodard, respectfully state as follows.

1. From 1985 through 1992, I was Vice President of Lutheran North St. Louis Outreach.

2. In January, 1990, I may have received a request from KFUE-AM-FM (Lutheran Church/Missouri Synod) for referrals of applicants for positions as a receptionist and a janitor. Apart from that contact, I can recall no previous or subsequent request from KFUE-AM-FM for referrals of candidates for employment.

I declare under penalty of perjury under the laws of the United States of America that the foregoing Declaration is true and correct to the best of my knowledge and belief.

Executed _____.

Kathryn Woodard

Federal Communications Commission	
Docket No.	94-10
Exhibit No.	15
Presented by	NAACP
Disposition	Identified 6/24
	Received 6/24
	Rejected
Reporter	BARBARA WOOD
Date	6/24/94

DECLARATION OF KATHRYN WOODARD

I, Kathryn Woodard, respectfully state as follows.

1. From 1985 through 1992, I was Vice President of Lutheran North St. Louis Outreach.

2. In January, 1990, I may have received a request from KFUE-AM-FM (Lutheran Church/Missouri Synod) for referrals of applicants for positions as a receptionist and a janitor. Apart from that contact, I can recall no previous or subsequent request from KFUE-AM-FM for referrals of candidates for employment.

I declare under penalty of perjury under the laws of the United States of America that the foregoing Declaration is true and correct to the best of my knowledge and belief.

Executed _____.

Kathryn Woodard

<u>Federal Communications Commission</u>	
Docket No.	<u>94-10</u>
Exhibit No.	<u>15</u>
Presented by	<u>NAACP</u>
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