additional problems with their study, there is a need for research by independent sources to ascertain what kind and how much educational programming is available as well as when it is broadcast.

As in the first study, NAB sent questionnaires to all commercial television stations with known fax numbers. Stations who replied to the 1994 survey were asked to list all of their children's programming broadcast in October, November, and December of 1994. Those stations, again with known fax numbers, who did not reply to the 1994 survey were asked to provide information for both the Fall of 1993 and the Fall of 1994. Again, the stations were asked to list when the program was broadcast (Fall 93, or 94), the title, day and time broadcast, length, and whether the program was a regular series or special.

Broadcasters were asked to list programming which <u>in their judgement</u> met the following definition:

> Programming originally produced and broadcast for an audience of children 16 years old and younger which serves their cognitive/intellectual or social/emotional needs.

This definition of educational or informational programming is vague and overly broad. Broadcasters are asked to use the same criteria they would use to list programs in their public files or for renewal proceedings. These criteria, however, are never spelled out and stations are not asked to indicate what criteria they used to fill out the questionnaire. The definition also does not use the crucial language from the legislation: "specifically designed" to serve the educational and informational needs of children. Finally, and what is most important, there are no examples of specific programs that fit this description. This is especially problematic in light of studies (for example, The Center for Media Education's 1992 study of license renewal applications and a 1995 study by Dale Kunkle) which found that programs such as "Mighty Morphin Power Rangers," "America's Funniest Home Videos," "The Jetsons" and "The Flintstones" were classified as educational by broadcasters. Consequently, it is impossible to ascertain if the programs included in the latest NAB analysis would be judged educational or informational by people other than the broadcasters themselves.

The survey is worded in a way that elicits socially desirable responses. The survey states,

> NAB is collecting key data from commercial television stations to help document the industry's response to the *Children's Television Act of 1990* and the FCC's *Report and Order* of April 1991 . . . (emphasis added)

The supposition is that the station should help by filling out the survey to show that it has broadcast "educational and

informational" programming for children, i.e., the station is asked to reply to show it has met the stipulations of the act. This, in conjunction with the vague definition of educational and informational programming that is dependent only upon the broadcaster's judgment, serves to bias responses in favor of reporting more rather than less programming.

Although the sample size is larger, I believe there is still concern about the nature and size of the sample. The universe of commercial television stations numbers 1179 (Broadcasting & Cable, October 23, 1995, p. 87). NAB sent questionnaires, however, only to the 79% of the commercial stations (937) with "known fax numbers" -- including the 278 who responded to the 1994 survey. Thus 21% of the nation's commercial broadcasting stations were automatically omitted because they do not have fax machines. NAB reports that the response rate of this study (59.7%) is considerably higher than the rate in the 1994 survey (31.1%). Nevertheless the response rate of this survey (and that completed in 1994) is inflated because more than one-fifth of the stations were not surveyed. In short, the report is based on data from less than half (47%) of all commercial broadcasting stations in the nation.

Although NAB believes that the data show a positive rather than negative non-response bias, I cannot agree. In the first place, a large proportion of the stations did not respond to the survey (53% of all stations). Moreover, since NAB surveyed ONLY stations with working FAX numbers, it appears that stations with fewer financial resources were specifically omitted from the study. These stations may also have less to spend on educational and/or informational programming for children. Second, the stations who did not respond to the 1994 survey but did respond to the 1995 survey, may have realized (due to the high visibility of the CME reports in the media) that they had more leeway than then originally thought in specifying what constitutes educational or informational programming. Again, in this study (and in license renewal proceedings), what stations select to call educational and informational programming is left to their discretion. Moreover, the overly vague definition, with no examples of what constitutes educational programming, makes it easy for station managers/owners say that just about any type of program serves children's educational and informational needs. Moreover, even though stations were asked to list specific programs as part of the data collection procedure, the NAB report chose to provide no information as to the actual programs that were cited by the stations as serving children's needs.

Consequently, given (1) the lack of adequate guidelines and a suitable operationalization of the definition of educational programming, (2) the tendency for those in control to respond in a socially desirable way to "help document the industry's response," and (3) the fact that more than half of the broadcast stations either did not reply or were not even contacted as part of the process, the numbers cited in this study more than likely

overestimate the amount of educational/informational programming available on a weekly basis.

Finally, as was true with the first study, practically all of the programs (97%) were broadcast after 6AM and four out of five were broadcast after 7AM. The report does not indicate, however, how many programs were broadcast in the afternoon hours, the time when most school aged children (five to 16) would be likely and available to watch. The questionnaire indicates that this analysis could have been conducted. Consequently, it is impossible to ascertain if the programming deemed to fit the educational/informational criteria by broadcasters actually is broadcast when most children, particularly school aged children, are in the audience. If educational/informational programs are broadcast in time periods when the relevant audience is unavailable, then it is quite likely that these programs would not attract a sufficient number of viewers and an adequate case could be made for the undesirability of educational and informational programming in terms of numbers of viewers.

In light of these concerns, I believe that even though the data presented show that slightly more time seems to be devoted to educational and informational programs (although no evidence is presented as to whether or not this is a statistically significant increase), NAB's conclusion that the industry has responded adequately to the conditions of the Children's Television Viewing Act is still unwarranted. The problems lie with the global nature of the study particularly the vague definition of educational and informational programming and the fact that the survey was designed to elicit socially desirable responses ("help document the industry's response") from broadcasters. Finally, the survey still under represents ALL commercial broadcasters, relying only on those stations with known fax numbers (and presumably more financial resources).

Clearly, there is a need to address this issue in an unbiased way. It is imperative to enlist an outside sources to document the amount of time and the type of programs devoted to serve the educational and informational needs of our children.

If I can be of further assistance please do not hesitate to get in touch with me.

Sincerely,

Nancy

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Professor