Before the
Federal Communications Commission
Washington, D.C. 20554

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In the Matter of	)	
	)	
Review of the Commission's	)	MM Docket No. 98-204
Broadcast and Cable	)	
Equal Employment Opportunity	)	
Rules and Policies	)	
and	)	
Termination of the	)	MM Docket No. 96-16
EEO Streamlining Proceeding	)	

COMMENTS OF
AMERICAN WOMEN IN RADIO & TELEVISION, INC.

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List A B C D E

TABLE OF CONTENTS

		Page
Summary		ii
I.	Introduction	1
II.	The Measurement of Recruitment Efforts Should Be Based on A Targeted Strategy To Reach Women and Minority Potential Applicants.	3
	• Effective Outreach Should Permit Creative Solutions	3
	• Efforts to Reach Women	5
	• All Positions Have the Potential to Influence Programming Decisions.	6
	• Greater Employment Opportunities Will Lead to Greater Ownership by Women and Minorities.	7
	• Employment of Women Positively Influences Programming.	8
III.	Data Collection Is A Critical Element In Assessing the Success and Validity Not Only of An EEO Program But Also Policies Promoting Diversity of Ownership.	8
	• Small Stations Should Not Be Exempt.	10
IV.	The Use of Random Audits Is An Appropriate Enforcement Mechanism.	11
V.	Conclusion.	12
Exhibit 1	*Employment and Equality: Assessing the Status of Women On Screen and Behind the Scenes in the 1997-98 Prime-time Season,* Martha M. Lauzen, Ph.D. for Women in Film (September 1998)	

SUMMARY

AWRT supports the Commission's decision to retain the cable and broadcast EEO program and supports the proposals in the Notice of Proposed Rulemaking. AWRT believes that the goals of EEO would be best achieved by encouraging broadcasters and cable operators not only to continue to advertise job vacancies widely but, more important, to develop a long-term strategy to reach women and minority potential job applicants. In addition to listing vacancies in the available general and targeted publications, the best strategy is a combination approach that involves choosing the activities that will best fit the community and the resources of the station, *e.g.*, participating in industry job fairs, internship programs, internal training and promotion, internship opportunities, involvement as a sponsor or member of industry organizations that promote women and/or minority advancement in the industry, and extensive use of on-line resources.

All stations and all job categories should be included in the Commission's revised EEO program. Advances in technology have greatly reduced the burden that would be imposed on smaller stations of participating in EEO, and the need is great to collect data to assess both the state of women and minorities in the industry as a whole and the success of the new EEO program. Reviewing only the top job categories ignores one of the greatest sources stations and operators have of filling vacancies: internal promotion. Further, AWRT believes that all position have the potential to influence programming and should be included in the revised EEO rules.

The lack of data on the status of women in the industry, in particular, adds an element of guess work to the determining the appropriate type and extent of outreach

efforts. AWRT applauds the Commission for its decision to start collecting ownership data, and encourages the Commission to adopt measure that will permit real analysis of the status of women in the industry.

COMMENTS OF
AMERICAN WOMEN IN RADIO & TELEVISION, INC.

American Women in Radio & Television, Inc. (AWRT) hereby submits its comments regarding the Notice of Proposed Rulemaking ("Notice") in the captioned proceeding. AWRT supports the Commission's decision to retain the cable and broadcasting rules' general Equal Employment Opportunity ("EEO") policy/program requirements, and, generally, supports the proposals in the Notice.

I. Introduction.

AWRT is a national, non-profit organization of professional women and men who work in radio, television, cable, advertising and closely allied fields. The mission of AWRT is to enhance the impact of women in the electronic media and allied fields by educating, advocating, and acting as a resource to its members and the industry. AWRT is the oldest professional association promoting the interests of women in the communications industry. Since its founding in 1951, AWRT has worked to promote the entry and advancement of women in broadcasting, cable and related communications companies. To this end, AWRT conducts educational and professional development activities to promote and facilitate such opportunities for women. In addition, for nearly three decades, the AWRT Foundation has recognized individuals whose work assists the goals of the organization.

AWRT has been a vocal participant in Commission proceedings involving the Commission's EEO rules and policies as well as other proceedings involving issues of gender, such as barriers to market entry by small businesses, reform of the comparative

hearing process, bidding incentives in spectrum auctions, access to capital, and ownership by women of mass media facilities.

With respect to the Commission's proceeding involving the streamlining of the EEO rules,[1] AWRT strongly encouraged the Commission to utilize a negotiated, rather than a traditional, rulemaking process to revise the EEO rules. AWRT suggested that the industry urge the Commission to produce effective rules and policies that also reduce the burdens on broadcasters while, at the same time, promote programming that reflects to a greater extent than before the interests of minorities and women in the local community and act to deter discriminatory employment practices. AWRT believes that it is possible to craft rules that meet these objectives and supports the Commission in its effort to achieve this end.

More recently, AWRT participated in efforts to establish a dialog among several organizations whose constituents have an interest, as either employer or employee, in the application of the Commission's EEO rules and policies. The purpose of these discussions was to achieve consensus with respect to the EEO rules and recommend to the Commission an EEO program that would meet these objectives. While these discussions did not produce a viable consensus, AWRT remains deeply committed to find the balance between the need for productive outreach and the need for manageable administration of those efforts.

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[1] *See In the Matter of Streamlining Broadcast EEO Rules and Policies, Vacating the EEO Forfeiture Statement and Amending Section 1.80 of the Commission's Rules To Include EEO Forfeiture Guidelines*, MM Docket No. 96-16, 11 FCC Rcd 5154 (1996) (Notice of Proposed Rulemaking) ("*Streamlining Notice*").

II. The Measurement of Recruitment Efforts Should Be Based on A Targeted Strategy To Reach Women and Minority Potential Applicants.

As a general principle, the quality of outreach is not measured by the quantity of advertisements. Also, as a general principle, AWRT supports measures that reduce the inefficient business practices. AWRT believes, therefore, that the goals of EEO would be better achieved by a result-oriented standard ("Is our strategy reaching women and minority applicants both in our community and elsewhere?") than by a number-of-sources standard ("Have we placed the requisite numbers of advertisements?").

The focus of outreach efforts should be long-term as well as short-term. In the short term, every open position should be advertised in a manner that is reasonably calculated to reach women and minority applicants in the region and, depending on the position, across the country. In the long term, the industry as a whole should think about how to coax the changes that will bring more women and minority applicants to the table. In addition to continuing to list job openings as widely as necessary and participate in job fairs to reach potential women and minorities applicants, AWRT would like to encourage broadcasters and cable operators to adopt long-term educational, mentoring and professional development elements in their outreach strategies. For example, AWRT has had the opportunity to review the Model Broadcast Careers Program Road Map developed by the Broadcast Executive Directors Association and supports the educational and outreach approach it outlines.

- ***Effective Outreach Should Permit Creative Solutions.***

In terms of how the Commission may measure effective outreach, broadcast licensees should be required to show, both midway through the license term[2] and again at

[2] *See* Notice at ¶ 76.

renewal, that, for the previous year, targeted recruitment occurred by undertaking at least eight of the following twelve steps (for stations with more than ten employees) or at least five of the twelve (for stations with fewer than ten employees):

- ***Participation in a local, regional or national job fairs*** targeted to recruitment for the broadcast or cable industry at least annually. Participation must be by representatives with hiring authority and be publicized by the licensee. Examples would include RAB, NAB, AWRT, State Broadcaster Association Sponsored Job Fairs where the resumes are compiled and posted in a job bank.

- ***Co-sponsoring job fairs with women's and minority organizations*** in the business and professional community. Licensees should be required to publicize the job fairs on-air, through station newsletters and on Internet home pages.

- ***Posting of each top-four job category opening with State Broadcasters Associations*** that maintain current files and widely publicize or distribute job listings (including use of Internet home pages).

- ***Listing*** each top-four job category openings with media trade groups with a broad membership of women and minorities (AWRT, NAHJ, NAAJ, NANAJ, NABJ) that maintain job banks or advertise job openings in their newsletters.

- ***Listing*** all job openings in local newspaper(s) of general circulation and in the locally distributed publications of women's and minority organizations.[3]

- ***Online listing*** of all openings on the station's Internet home page and ***linking*** the station's Internet home page (that includes job listings) to the home page of women's and minority organizations.

- Participation in ***internship programs*** with local high schools, colleges and universities.

- ***Contacting college and university placement centers*** and/or placing advertisements in the newspapers of such institutions.

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[3] AWRT opposes mandating which sources must be used or that sources be dropped. Since enforcement, other than at renewal time, may occur by random audit, it seems unnecessary to mandate a minimum number of sources, since the adequacy of the effort could be judged in the context based on the sources available to the licensee, which is to say, subjectively. Notice at ¶ 65.

- Participation as a ***sponsor or member***, in the convention or local events sponsored by women and minority media trade groups (AWRT, NABJ, AWIC).

- Internal ***training and promotion*** opportunities available to ***all*** employees.

- Listing all job openings on a 24-hour ***job line*** (i.e., voice mail) maintained by the stations and publicized on the air.

- Encouragement and use of ***networking*** by existing employees and management to reach women and minority applicants, with a bonus or other recognition for the referral of women and minority applicants.

This type of program is susceptible to electronic reporting. Licensees may respond by checking boxes of the activities that were undertaken, and may provide numbers in response to other questions, such as how many contacts with women or minority applicants did a particular activity produce? How many people work at the station? How many women or minority employees currently fill the top four job categories at the station? Other job categories? Hopefully, the electronic format would permit short comments, for example, in response to a question such as whether the station engaged in any other type of activity to reach women and minority applicants.

- ***Efforts to Reach Women.***

Efforts to reach women should include the same sources that are used to reach men (e.g., industry publications, local newspapers, employment agencies). Because the pool of women applicants has continued to increase as educational opportunities have increased, contacting educational institutions should be particularly useful in expanding the pool of women. Women's professional organizations, such as AWRT, play a

significant role in reaching women, and EEO outreach should include contacting the organizations that have a primary focus on promoting women in the communications industry.

Since some broadcast stations and cable operators are not aware of which organizations are available to assist in this regard and how to contact them, AWRT suggests that the Commission make available to stations and operators a list of the professional organizations whose mission is to advance the influence of women in the industry. While these nationwide organizations may not have a presence in every local community, the exponential growth of the Internet has made information and resources more easily accessible and, therefore, increased the relevance of the networks represented by organizations such as AWRT, Women in Cable & Telecommunications, AWIC, Women in Film & Video, and Women of Wireless, to name a few.

- ***All Positions Have the Potential to Influence Programming Decisions.***

There has yet to be a study published that concludes that the presence of women in a workplace has no impact on the way that business is conducted. AWRT disagrees with the conclusion of the U.S. Court of Appeals for the D.C. Circuit in the *Lutheran Church*[4] case that lower-level positions have no influence on business decisions, including programming. The individuals who hold lower-level positions are the ready pool of people available for internal training and promotion. In some cases, the best means to obtain the requisite experience to hold a position of greater influence, or to understand enough about the business to know what experience is necessary, is by working up from entry level positions. Therefore, recruitment efforts for lower-level

[4] *Lutheran Church-Missouri Synod v. FCC*, 141 F.3d 344 (D.C. Cir. 1998), *rehearing denied*, Sept. 15, 1998.

positions do influence programming decisions. For this reason, AWRT disagrees with the Commission's proposal to exclude internal promotions from EEO review.[5]

- ***Greater Employment Opportunities Will Lead to Greater Ownership by Women and Minorities.***

AWRT agrees that increasing number and type of employment opportunities available for women and minorities will increase the number of women and minorities who seek ownership opportunities.[6] Training and experience are critical elements in deciding to seek ownership of broadcast and cable facilities. AWRT's informal survey of its membership reveals that those members who are, or have been, owners of broadcast facilities had significant prior experience working in the industry and view their employment experiences as integral to both their decision to move up to ownership and their success as an owner.

Statistics regarding ownership by women of broadcast and cable facilities, however, are scarce. The few studies available are now becoming outdated.[7] In the past, this information has not been collected by either the Commission or the National Telecommunications and Information Administration but by the Bureau of the Census.

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[5] *See* Notice at ¶ 63.

[6] Notice at ¶ 45.

[7] AWRT has provided this information to the Commission in previous proceedings. *See, e.g.,* AWRT Comments *In the Matter of Policies and Rules Regarding Minority and Female Ownership of Mass Media Facilities*, MM Docket Nos. 94-149 and 91-140, filed May 17, 1995. Attached to AWRT's comments were several studies, including: *Women-Owned Businesses*, U.S. Department of Commerce, Bureau of the Census (1990); *Women-Owned Businesses: Breaking the Boundaries*, The National Foundation for Women Business Owners and Dun & Bradstreet Information Services (April 1995).

The Commission's recent decision to include a designation of the gender and race of broadcast station owners in ownership filings is a significant step in the right direction. Still, AWRT urges the Commission to undertake a broader study of this issue.

- ***Employment of Women Positively Influences Programming.***

There is recent data that concludes that women working behind the scenes in the creation of programming influences how women are portrayed. A 1998 study by Dr. Martha Lauzen at the School of Communication at San Diego State University, undertaken for Women in Film, concluded that, when women are working behind the scenes, programming includes more -- and more empowered -- female characters.[8] While this study speaks to the influence of women in the creation of programming, and not specifically to decisions by stations and operators with respect to choosing programming, the study is still very informative with respect to the positive effect of including more women in the communications industry, and the importance of outreach efforts.

III. Data Collection Is A Critical Element In Assessing the Success and Validity Not Only of An EEO Program But Also Policies Promoting Diversity of Ownership.

The key to understanding the appropriate approach to EEO (and to policies promoting diversity of ownership) is data collection, and AWRT applauds the recent efforts of the Commission to begin to acquire such data.[9] For several years, both at the Commission and on Capitol Hill, AWRT has emphasized the need to collect such data. It

[8] *Employment and Equality: Assessing the Status of Women On Screen and Behind the Scenes in the 1997-98 Prime-time Season,* Martha M. Lauzen, Ph.D. for Women in Film (September 1998), attached hereto as Exhibit 1.

[9] *In the Matter of 1998 Biennial Regulatory Review – Streamlining of Mass Media Applications, Rules, and Processes, Policies and Rules Regarding Minority and Female Ownership of mass Media Facilities,* MM Docket No. 98-43, Report and Order (rel. Nov. 25, 1998), at ¶¶ 100-05.

is the case, however, that employment data on women and minorities in broadcasting and cable will not be collected unless required by the Commission. It is also the case that the public sector has the best resources to gather national, regional and state data on education, status in the workforce and compensation.[10]

Self-assessment by broadcasters and cable facilities is key to understanding the effectiveness of both outreach efforts and a revised EEO program.[11] Self-assessment should occur, at a minimum, every other year, with reporting to the Commission, at a minimum, every four years. Reports should cover, at a minimum, the previous year's efforts. This would result in broadcasters reporting to the Commission once midway through the license term, and once at the time of renewal. AWRT agrees that the most sensible approach with respect to cable operators is to include the EEO reporting with the Form 395-A Supplemental Investigation Sheet.

The records involved in such self-assessment should include:

- an overall list of the outreach sources the station or operator believes are available to it both in its local community and nationally;
- listing of recruiting sources used (including outside advertisements, online advertisement, job fair, trade meetings or convention, etc.);
- dated copies of all advertisements, bulletins, etc., announcing a vacancy;
- the date the vacancy was filled;
- a record of the race, ethnic origin and gender of all applicants for the vacancy; and
- a record of the race, ethnic origin and gender of all employees.

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[10] The Federal Glass Ceiling Commission, *Good for Business: Making Full Use of the Nation's Human Capital*, Washington, D.C. (March 1995) at 29.

[11] *See* Notice at ¶ 72.

- ***Small Stations Should Not Be Exempt***

While certain stations and operators may be located in areas where only a small percentage of the population is minority, there is no area of the country where efforts to recruit women would be made more difficult because there are few women in the area. There is no reason, save administrative burdensomeness, for exempting small stations from efforts to reach out to women and minorities. Advances in technology have greatly reduced the burden of identifying available resources, making job openings known, and complying with FCC filing and reporting requirements. Electronic filing is already required for all broadcasters with respect to compliance with the rules regarding children's programming, and electronic communications are greatly reducing the burden of complying with FCC rules in policies in other ways. Therefore, the administrative basis for exempting stations with fewer than five full-time employees is no longer valid.

Exempting smaller stations from specific record keeping and reporting requirements would be likely to exempt over 50% of broadcast stations, if stations with fewer than 10 employees are exempted, and approximately 1/3 of stations, if stations with fewer than five employees are exempted.[12] The void created by failing to collect data from such a large proportion of stations is serious. Further, it ignores the role that small stations and small markets play in providing entry opportunities. Smaller stations and smaller markets may not offer high salaries or prime market access, but they can offer experience and training essential to breaking into the business. Moreover, small businesses are a very significant source of new job growth in the United States.[13]

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[12] *Streamlining Notice* at n.34.

[13] Small business accounted for 90% of all new jobs crated in 1990 as reported by the Small Business Administration. Opening Remarks of Michele C. Farquhar, Acting Chief of the Wireless

There is logic in requesting less complicated information from stations with fewer employees, but there is no longer logic in exempting them from record keeping and reporting.

IV. The Use of Random Audits Is An Appropriate Enforcement Mechanism.

AWRT supports the Commission's proposal to implement random EEO audits to enforce the revised EEO program.[14] Since, under the current proposal, broadcast stations will have reduced obligations to report to the Commission on their outreach efforts, there should be incentive for stations to maintain the same level of outreach during those periods for which no reporting will be required as during those periods that will be the subject of reporting. Random audits will also provide the Commission with a better basis than form-based reporting for judging whether the revised EEO program is working well in application.

Telecommunications Bureau, "Auctions '96" Conference, sponsored by the FCC Office of Communications Business Opportunities, March 15, 1996.

[14] Notice at ¶ 74.

V. Conclusion.

AWRT supports the Commission efforts to promote outreach and diversity in the broadcast and cable industries revise the EEO program and the proposals in the Notice.

Respectfully submitted,

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March 1, 1999

PRESS EMBARGO: CANNOT BE RELEASED WITHOUT WRITTEN PERMISSION FROM IRIS GROSSMAN, PRESIDENT OF WOMEN IN FILM UNTIL NOON ON SEPTEMBER 11, 1998

Employment and Equality: Assessing the Status of Women On Screen and Behind the Scenes in the 1997-98 Prime-time Season

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Women in Film was founded in 1973 in response to a growing need for an organization to support and promote professional women in the entertainment industry. Today, Women in Film has more than 10,000 members in over 40 chapters worldwide, with its headquarters in the Los Angeles area.

Women in Film is the only organization in the industry which represents virtually every facet, guild, and union of the entertainment industry. Its members work in every part of the business, including film, broadcast and cable television, and multimedia.

Since its inception, Women in Film has made significant contributions to the professional climate for women working in the film and television industries. This non-profit organization advocates equal opportunity and fair employment practices, promotion of women to key industry positions of authority and behind-the-camera employment, recognition and visibility for its members, and advocates for a more positive on-screen portrayal of women in film and television.

For 25 years, Women in Film's externship, internship, scholarship, and apprenticeship programs have provided its members with an important network of professional contacts, educational programs, and practical services that promote, nurture, and guide women to achieve their highest career potential.

Table of Contents

Employment and Equality:
Assessing the Status of Women On Screen and Behind the Scenes
in the 1997-98 Prime-time Season

	Page
Executive Summary	5
Methodology	5
Findings/On-Screen Representation of Women	5
Findings/Behind-the-Scenes Representation of Women	6
Findings/The Relationship Between Women Behind the Scenes and Women On Screen	7
Introduction	8
Method	9
On-Screen Representation and Portrayals of Women	10
Gender Representation by Program Genre	10
Gender Representation by Age	11
Gender Representation by Race	12
Gender Representation by Marital Status and Occupation	12
Behind-the-Scenes Representation of Women	15
Gender Representation by Program Genre	16
Creators	18
Executive Producers	19
Producers	20
Directors	21
Writers	22
Editors	23
Directors of Photography	24
The Relationship Between Women Behind the Scenes and Women On Screen	25
Commands	26
Interruptions	26
Controlling Conversations	26
Conclusions	28
Appendix A: 1997-98 Prime-time Programs in the Study	31

List of Tables

Employment and Equality:
Assessing the Status of Women On Screen and Behind the Scenes
in the 1997-98 Prime-time Season

		Page
Table 1:	Total Number of Female and Male Characters	10
Table 2:	Behind-the-Scenes Employment by Program Genre	17

List of Figures

Figure 1:	Gender and Age	11
Figure 2:	Gender and Race	12
Figure 3:	Gender and Marital Status	13
Figure 4:	Gender and Occupation	14
Figure 5:	Behind-the-Scenes Employment in the 97-98 Season	15
Figure 6:	Gender of Creators by Network	18
Figure 7:	Gender of Executive Producers by Network	19
Figure 8:	Gender of Producers by Network	20
Figure 9:	Gender of Directors by Network	22
Figure 10:	Gender of Writers by Network	23
Figure 11:	Gender of Editors by Network	24
Figure 12:	Female Writers and Use of Powerful Dialogue by Female Characters	27
Figure 13:	Comparison of Behind-the-Scenes Employment in TV and Film	29

Executive Summary

Employment and Equality:
Assessing the Status of Women On Screen and Behind the Scenes
in the 1997-98 Prime-time Season

This study examined the on-screen and behind-the-scenes representation of women in the top-rated entertainment series (situation comedies and dramas) of the 1997-98 prime-time season. The findings and analysis should be considered in this context.

Methodology

This study examined the top 100 prime-time entertainment programs of the first 12 weeks of the 1997-98 television season. By omitting non-series programs from the top 100, the total number of programs coded dropped to 64. The top shows were chosen from season-to-date household ratings from September 22, 1997, to December 14, 1997. One episode of each program was randomly selected and taped during the period of January 4, 1998, through February 28, 1998.

Findings/On-Screen Representation of Women

- Women accounted for 39% of all characters in the top-rated programs of the 1997-98 prime-time season. Women comprised 38% of all major characters (i.e., those essential to plot development).

- Fully 65% of female characters were in their 20s and 30s. The number of female characters dropped precipitously from 43% in their 30s to 12% in their 40s. The percentage of male characters in their 40s (22%) was almost double that of female characters (12%).

- Approximately 81% of female characters were white, 12% were African-American, 2% were Asian, and 1% were Hispanic. Viewers were more likely to see an extra-terrestrial (2%) than they were a female Hispanic character.

- Female characters were more likely to be identified by their marital status while male characters were more likely to be identified by their occupation. Female characters were most likely to hold "powerless" positions such as students, volunteers, and unemployed individuals. In contrast, male characters were most likely to hold "powerful" positions such as doctors, lawyers, and business owners.

Findings/Behind-the-Scenes Representation of Women

- Overall, women comprised only 21% of all creators, executive producers, producers, directors, writers, editors, and directors of photography in the top-rated programs considered.

- The percentage of female executive producers, producers, directors, and writers has declined from 28% in the 1995-96 season to 23% in the 1997-98 season.

- On the programs analyzed, women fared best as producers (29%), followed by writers (20%), executive producers (19%), creators (18%), editors (15%), directors (8%), and directors of photography (0%).

- When considering behind-the-scenes employment by program genre, with one exception (editors), women were more likely to work on situation comedies than dramas.

- Women comprised 18% (N=20) of creators in the programs considered. Sixty-nine percent (69%) of the programs had no female creators.

- Women comprised 19% (N=58) of executive producers in the programs considered. Forty-seven percent (47%) of the programs had no female executive producers.

- Women comprised 29% (N=123) of producers in the programs considered. Only 14% of the programs had no female producers.

- Women comprised 8% (N=5) of directors in the programs considered. Ninety-two percent (92%) of the programs had no female directors.

- Women comprised 20% (N=16) of writers in the programs considered. Eighty percent (80%) of the programs had no female writers.

- Women comprised 15% (N=11) of editors in the programs considered. Eighty-three percent (83%) of the programs had no female editors.

- There was not a single woman director of photography working on any of the programs considered. One hundred percent (100%) of the programs had no female directors of photography.

- By network, programs aired on ABC had the greatest percentages of female creators, executive producers, producers, and editors. Programs aired on Fox had the fewest female executive producers, producers, directors, and editors.

- Overall, neither the percentage of women working behind the scenes in the 1997-98 prime-time television season nor the percentage of women working behind the scenes on the top 100 films of 1997 exceeded 25%.

Findings/The Relationship Between Women Behind the Scenes and Women On Screen

- Overall, women working behind the scenes influenced on-screen portrayals of female characters.

- When a program had no women executive producers, female characters accounted for only 36% of all characters. When a program had at least one woman executive producer, female characters accounted for 42% of all characters. The presence of one or more women executive producers increased the percentage of female characters 6 percentage points.

- Programs with at least one female executive producer also tend to have greater numbers of female writers. On programs with no female executive producers, female writers accounted for only 13% of all writers. Women comprised 27% of all writers on programs with at least one female executive producer. The presence of at least one female executive producer on a program doubled the number of female writers.

- Female writers produce powerful dialogue for female characters. Female characters on programs with no female writers issued 37% of all commands. On programs with one or more female writers, female characters issued 42% of all commands.

- Female characters on programs with no female writers accounted for 40% of interruptions. On programs with one or more female writers, female characters accounted for 45% of all interruptions.

- Female characters on programs with no female writers accounted for 41% of first words. On programs with one or more female writers, female characters accounted for 59% of all first words.

- Female characters on programs with no female writers accounted for 31% of all last words in conversations. On programs with one or more female writers, female characters accounted for 54% of all last words.

Employment and Equality: Assessing the Status of Women On Screen and Behind the Scenes in the 1997-98 Prime-time Season

Introduction

In many respects, the 1997-98 season marked a sea change for women in prime time. Viewers said goodbye to some powerful prime-time mainstays including Cybill, Murphy, and Grace -- and hello to Dharma and Ally. Murphy Brown creator, Diane English noted that "It is the era of girls again" (San Diego Union-Tribune, June 13, 1998).

Powerful female characters had it rough. CBS moved Cybill so often, she couldn't find her audience -- and they couldn't find her -- sounding the death knell for a quality show before its time. Murphy struggled with and prevailed against breast cancer. And Ellen was just too gay. Actors such as Cybill and Ellen who challenged the programming decisions made by their networks were shown the door.

Behind the scenes, the numbers of women working in a number of powerful roles declined. And not a single female director of photography could be found on any of the programs considered in this study.

On a positive note, the number of female characters held steady at just below 40% -- although 65% of these characters were in their 20s and 30s. In addition, when women worked behind the scenes, they continued to create and imbue their female characters with powerful language patterns.

This report summarizes and documents the mixed bag that was the 1997-98 prime-time season. The first section examines the representation and portrayal of women on screen. The second section reports the representation of women behind the scenes, focusing on 7 powerful roles including creators, executive producers, producers, directors, writers, editors, and directors of photography. Finally, the third section examines how women behind the scenes influence on-screen portrayals of women.

Method

This study examined the top 100 prime-time entertainment programs of the first 12 weeks of the 1997-98 television season. By omitting sports programs (e.g., NFL Monday Night Football), news magazines (e.g., 20/20), and other non-series programs, the total number of programs coded dropped to 64. The top shows were chosen from Nielsen season-to-date household ratings from September 22, 1997, to December 14, 1997. A list of programs included in the study can be found in Appendix A.

One episode of each program was randomly selected and taped during the period of January 4 through February 28, 1998. For each program, the following items were coded: the on-screen representation and portrayal of women (age, race, occupation, marital status); the representation of women in 7 powerful behind-the-scenes roles including creator, executive producer (includes executive producers and co-executive producers), producer (includes producers, associate producers, co-producers, supervising producers, consulting producers, senior producers, coordinating producers), directors, writers, editors, and directors of photography; and use of powerful language patterns by characters (includes first words, last words, commands, and interruptions). Individuals occupying behind-the-scenes roles were tabulated as female or male. Individuals with gender ambiguous names were identified through the Academy of Television Arts & Sciences and various production companies.

On-Screen Representation and Portrayals of Women

In the 1997-98 season, women comprised 39% of all characters in prime time, up slightly from 37% in the 1995-96 season. Women comprised 38% of major characters -- those essential to plot development -- down from 43% in the 1995-96 season.

Table 1:

Total Number of Female and Male Characters
in the Top Rated Prime-time Programs of 1997-98

Total number of characters:	934
Females:	363 (39%)
Males:	571 (61%)
Total number of major characters:	557
Females:	209 (38%)
Males:	348 (62%)

Historically, women have accounted for approximately one-third of all prime-time characters. The findings of this study, as well as a previous study of the 1995-96 season, suggest that the percentage of female characters has inched upward to slightly more than one-third of all characters in prime time.

Gender Representation by Program Genre

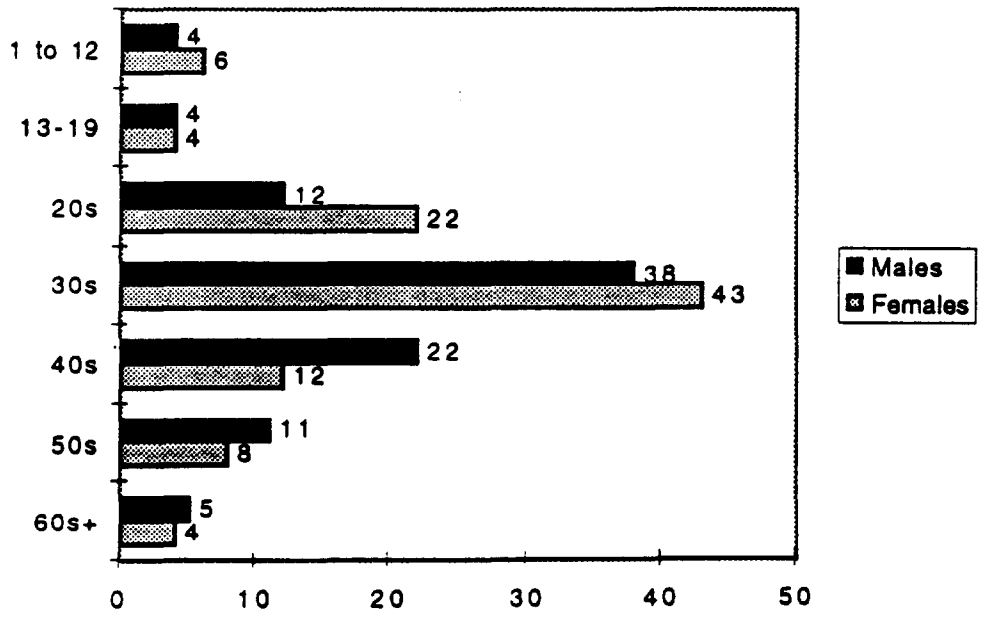
In the 1997-98 season, situation comedies featured slightly more female characters than dramas. In the situation comedies analyzed, women comprised 41% (N=163) and men 59%(N=239) of all characters. In the drama series considered, women comprised 38% (N=200) and men 62% (N=332) of all characters.

Analysis of major characters only revealed similar representation of female characters. Women comprised 37% (N=94) of major characters in situation comedies and 38% (N=115) of major characters in dramas.

Gender Representation by Age

For many women on screen, life ends at 39. Women 40 and over comprised only 24% of all female characters. As Figure 1 illustrates, approximately 10% (N=36) of female characters were under the age of 20, 22% (N=80) were in their 20s, 43% (N=157) were in their 30s, 12% (N=42) were in their 40s, 8% (N=29) were in their 50s, and 4% (N=12) were in their 60s. Fully 65% of female characters were in their 20s and 30s. The number of female characters dropped precipitously from 43% in their 30s to 12% in their 40s. Male characters did not experience as severe a decline from their 30s to their 40s. In fact, the percentage of male characters in their 40s (22%) was almost double that of female characters (12%).

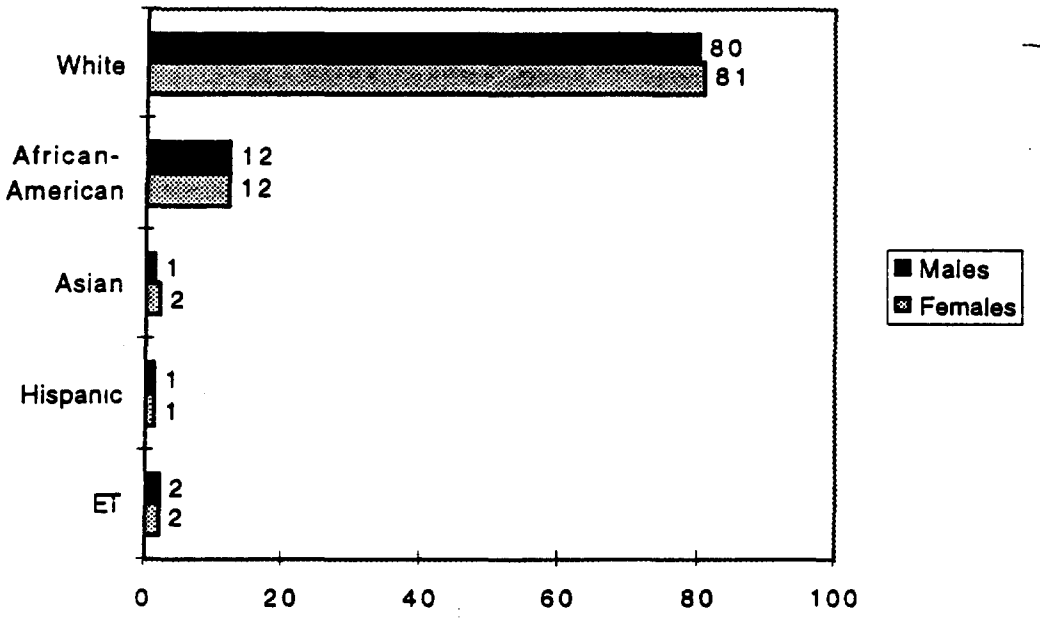
Figure 1: Gender and Age



Gender Representation by Race

Figure 2 illustrates gender representation of characters by race. Approximately 81% (N=295) of female characters were white, 12% (N=44) were African-American, 2% (N=7) were Asian, and 1% (N=4) were Hispanic. Viewers were more likely to see an extra-terrestrial (2%, N=8), than they were a female Hispanic character.

Figure 2: Gender and Race



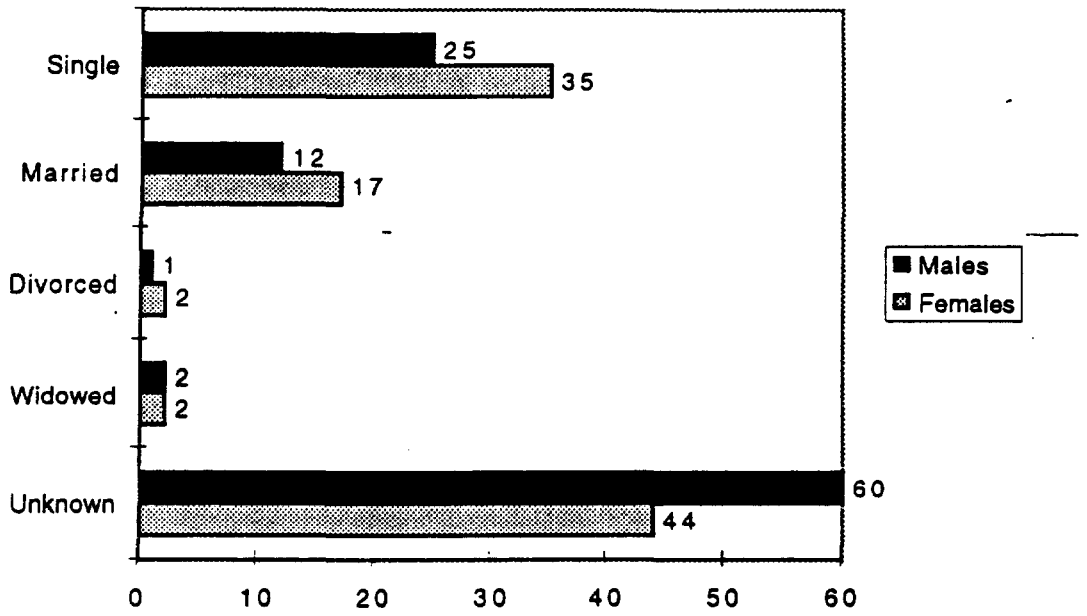
Gender Representation by Marital Status and Occupation

Traditionally, male characters have been identified by their occupation, while female characters have been identified by their marital status. Characters in the 1997-98 season were no exception.

As Figure 3 illustrates, female characters were more likely than male characters to have a known marital status. Approximately 35% (N=126) of female characters were single or engaged, 17% (N=61) were married or separated, 2% (N=8) were divorced, and 2% (N=7) were widowed. Approximately 44% (N=161) of female characters did not have

an identifiable marital status, while 60% (N=345) of male characters' marital status could not be identified.

Figure 3: Gender and Marital Status



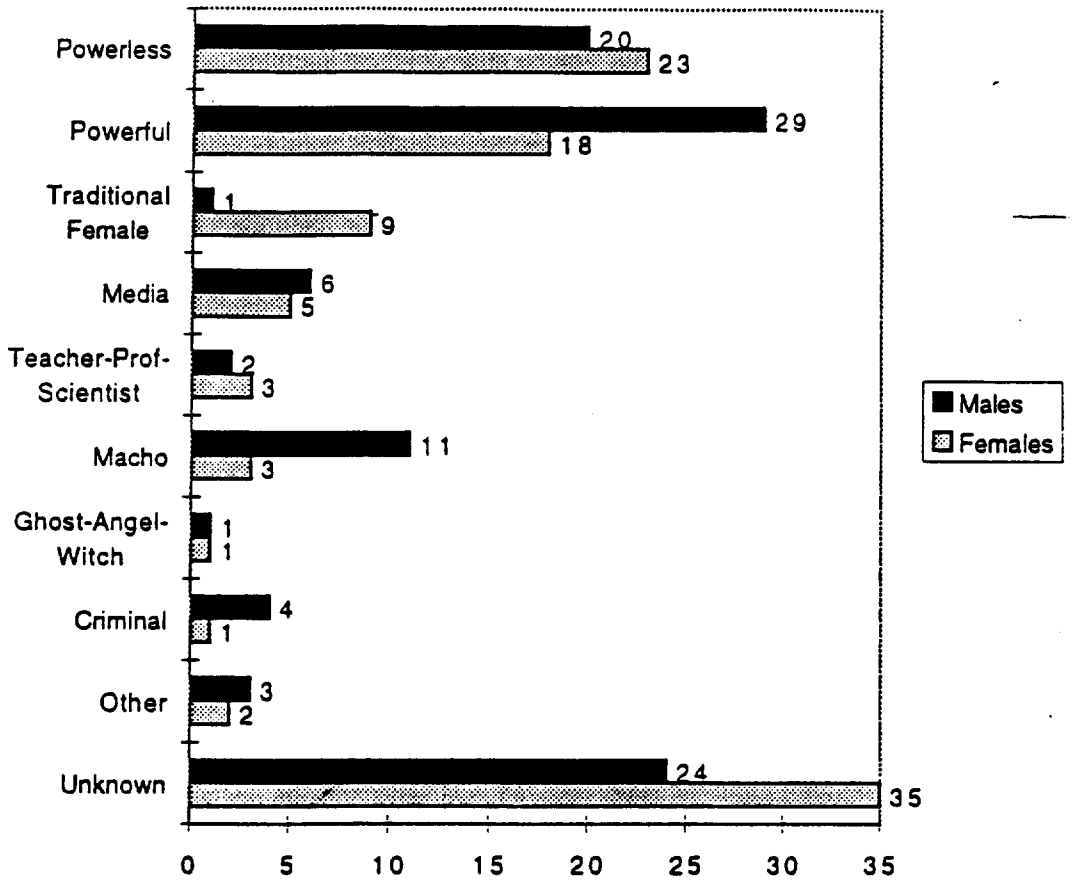
In contrast, while 35% (N=127) of female characters had no identifiable occupation, only 24% (N=135) of male characters could not be identified by occupation (Figure 4). Female characters were most likely to be portrayed in "powerless" roles such as students, unemployed individuals, job applicants, retired individuals, and volunteers. Approximately 23% (N=84) of female characters held these powerless roles.

Approximately 18% (N=65) of female characters held "powerful" roles such as lawyers, doctors, detectives, business owners, and executives. In contrast, 29% (N=163) of male characters held these powerful roles.

Nine percent (9%, N=33) of female characters held "traditionally female" roles including homemaker, nurse, clerical worker, and child care provider. Less than one percent (1%, N=4) of male characters were portrayed in these roles.

Finally, male characters were much more likely than female characters to hold "macho" jobs, or roles requiring physical strength such as security workers, laborers, enlisted military, or athletes. Approximately 11% (N=65) of male characters but only 3% (N=10) of female characters held these roles.

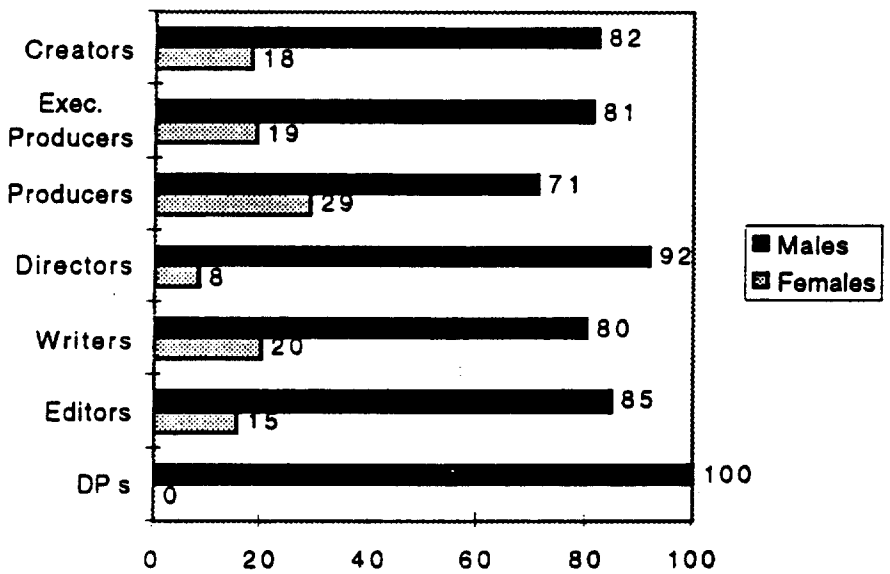
Figure 4: Gender and Occupation



Behind-the-Scenes Representation of Women

Overall, women comprised only 21% of all creators, executive producers, producers, directors, writers, editors, and directors of photography in the 1997-98 prime-time season. If only executive producers, producers, directors, and writers are considered, women comprised 23% of all behind-the-scenes workers, down from 28% in the 1995-96 prime-time season. Figure 5 displays behind-the-scenes employment by gender in the programs considered from the 1997-98 season.

Figure 5: Behind-the-Scenes Employment in the 97-98 Season



In prime time, women fared best as producers (29%), followed by writers (20%), executive producers (19%), creators (18%), editors (15%), directors (8%), and directors of photography (0%).

Gender Representation by Program Genre

Situation comedies account for 56% (N=36) and dramas 44% (N=28) of programs considered in this study. Table 2 breaks down behind-the-scenes employment by program genre. With the exception of editors, greater percentages of women worked on situation comedies than dramas. In the situation comedy program genre, women were most likely to work as producers (30%), followed by executive producers (22%), writers (22%), creators (20%), editors (9%), and directors (8%). In the drama program genre, women were most likely to work as producers (26%), followed by editors (25%), writers (17%), creators (15%), executive producers (12%), and directors (7%).

Table 2:
Behind-the-Scenes Employment by Program Genre

Role	Situation Comedy	Drama
Female Creators	20% (N=13)	15% (N=7)
Male Creators	80% (N=51)	85% (N=39)
Female Exec. Producers	22% (N=45)	12% (N=13)
Male Exec. Producers	78% (N=156)	88% (N=97)
Female Producers	30% (N=77)	26% (N=46)
Male Producers	70% (N=176)	74% (N=128)
Female Directors	8% (N=3)	7% (N=2)
Male Directors	92% (N=33)	93% (N=26)
Female Writers	22% (N=11)	17% (N=5)
Male Writers	78% (N=39)	83% (N=24)
Female Editors	9% (N=4)	25% (N=7)
Male Editors	91% (N=39)	75% (N=21)
Female DP s	0% (N=0)	0% (N=0)
Male DP s	100% (N=32)	100% (N=28)

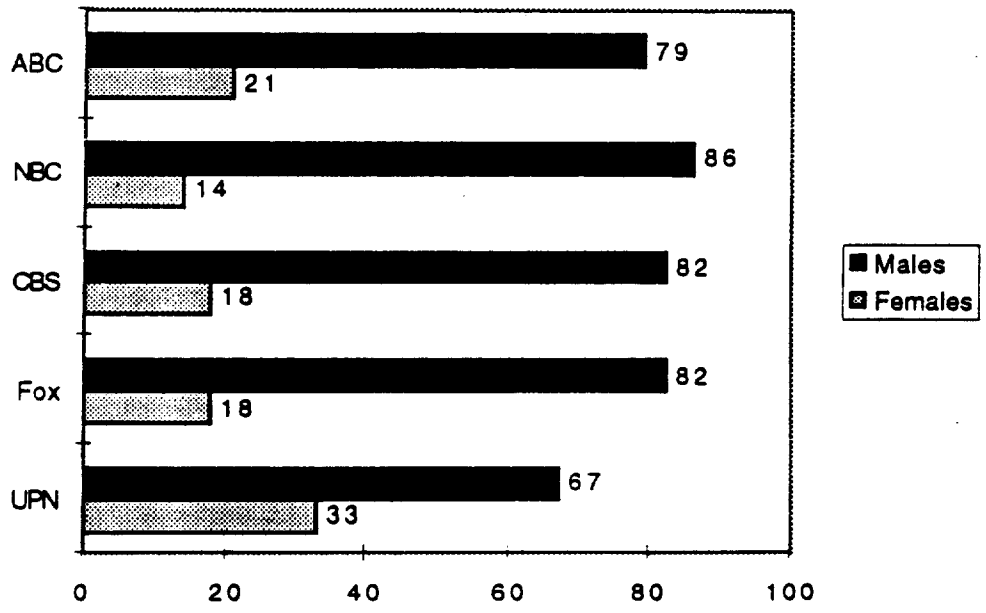
The following analysis considers each behind-the-scenes role individually and discusses findings by program genre and network.

Creators. Women comprised 18% (N=20) and men comprised 82% (N=90) of creators in the programs considered. Women creators were more likely to work on situation comedies (20%, N=13) than dramas (15%, N=7).

Sixty-nine percent (69%) of the programs considered had no female creators.

Figure 6 displays the gender of creators by network. UPN had the highest percentage of women creators (33%). Note, however, that this represents only 1 creator out of a total of 3. Women comprised 21% (N=6) of creators at ABC, 18% (N=6) at CBS, 18% (N=2) at Fox, and 14% (N=5) at NBC.

Figure 6: Gender of Creators by Network

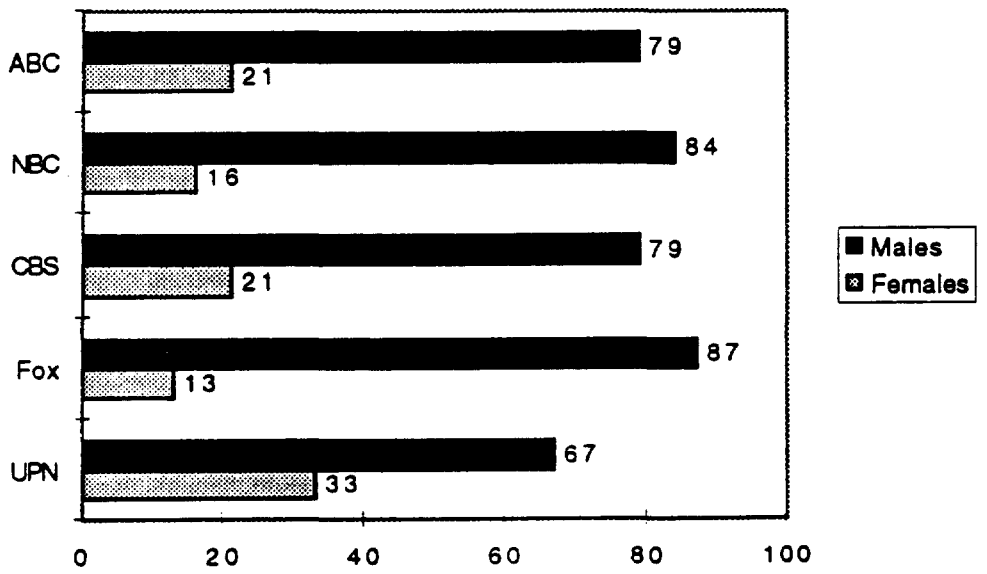


Executive Producers. Women comprised 19% (N=58) and men comprised 81% (N=253) of executive producers in the programs considered. Women executive producers were much more likely to work on situation comedies (22%, N=45) than dramas (12%, N=13).

Forty-seven percent (47%) of the programs considered had no female executive producers.

Figure 7 displays the gender of executive producers by network. UPN had the highest percentage of executive producers (33%). Note, however, that this represents only 1 executive producer out of a total of 3. Women comprised 21% (N=22) of executive producers at CBS, 21% (N=13) at ABC, 16% (N=16) at NBC, and 13% (N=6) at Fox.

Figure 7: Gender of Executive Producers by Network



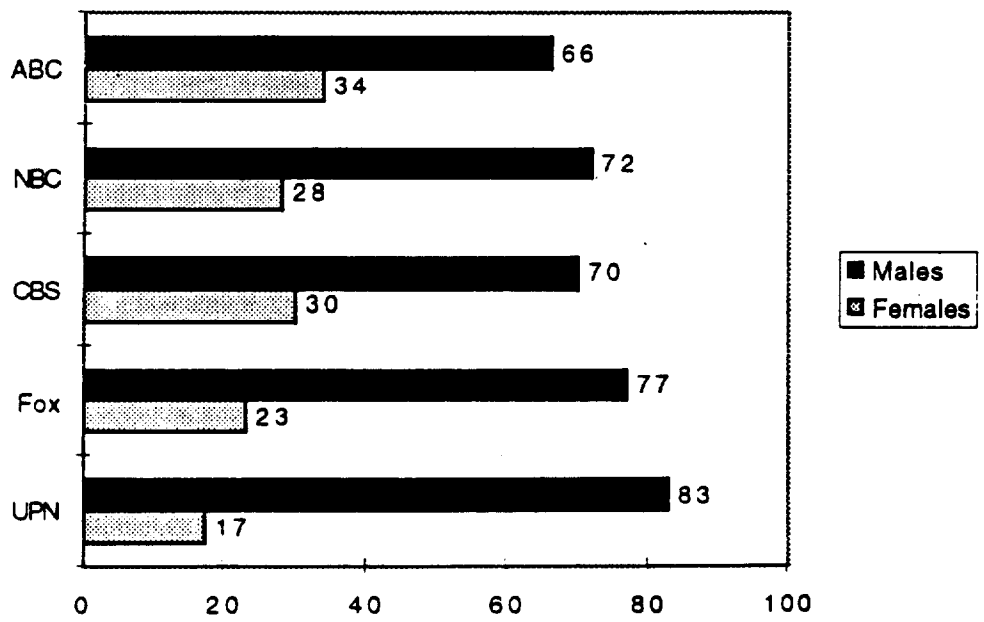
Producers. Women comprised 29% (N=123) and men comprised 71% (N=304) of producers in the programs considered. Women producers were more likely to work on situation comedies (30%, N=77) than dramas (26%, N=26).

Only 14% of the programs considered had no female producers.

In 1990, Sally Steenland conducted a study of women working behind the scenes in prime-time television. She found that women comprised 15% of all producers in that year. Although the numbers are not directly comparable with the current study, it appears that the number of women producers has increased over the decade of the 1990s.

Figure 8 displays the gender of producers by network. Women comprised 34% (N=31) of producers at ABC, 30% (N=37) at CBS, 28% at NBC (N=40), 23% (N=14) at Fox, and 17% (N=1) at UPN.

Figure 8: Gender of Producers by Network



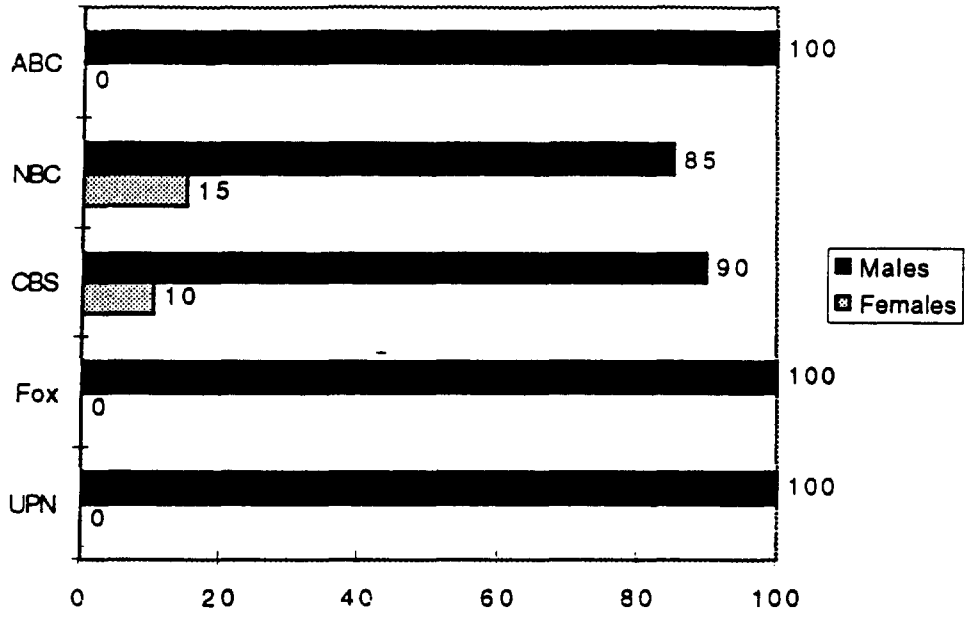
Directors. Women comprised 8% (N=5) and men comprised 92% (N=59) of directors in the programs considered. The women directors included Mary Harron (Homicide), Dorothy Lyman (The Nanny), Melanie Mayron (Nash Bridges), and Lee Shallat Chemel (Fired Up, Veronica's Closet). Women directors were slightly more likely to work on situation comedies (8%, N=3) than dramas (7%, N=2).

Ninety-two percent (92%) of the programs considered had no female directors.

Steenland found that women comprised 9% of directors in 1990. A directly comparable study conducted by Lauzen of the 1995-96 prime-time season found that women comprised 11% of directors in prime time. Thus, the percentage of women directors has decreased 3 points in the last 2 years.

Figure 9 displays the gender of directors by network. Women comprised 15% (N=3) of directors at NBC and 10% (N=2) at CBS. ABC, Fox, and UPN had no programs with female directors among the programs considered.

Figure 9: Gender of Directors by Network



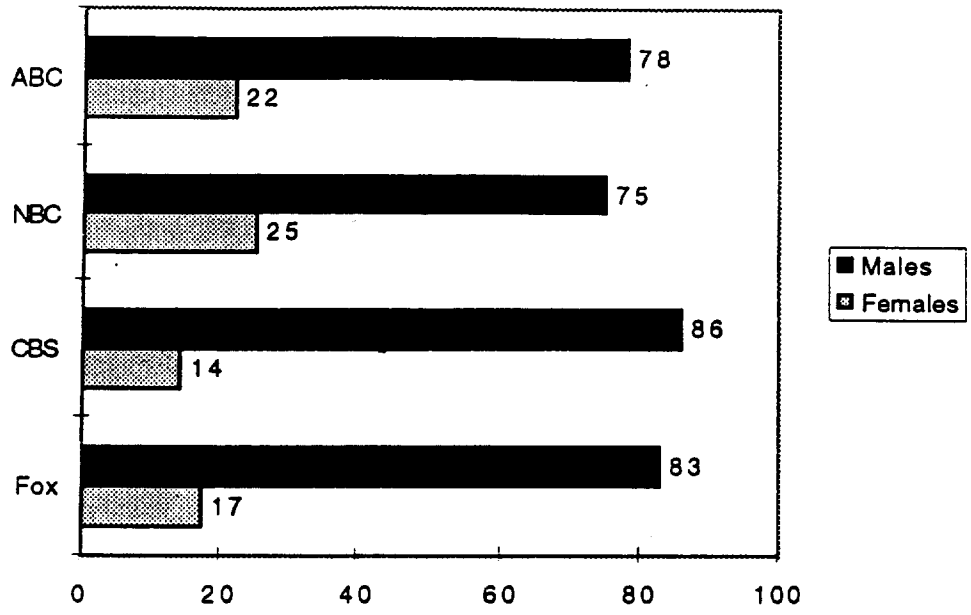
Writers. Women comprised 20% (N=16) and men comprised 80% (N=63) of writers in the programs considered. Women writers were more likely to work on situation comedies (22%, N=11) than dramas (17%, N=5).

Eighty percent (80%) of the programs considered had no female writers.

In 1990, Steenland found that women comprised 25% of writers. In the 1995-96 season, Lauzen found that women comprised 22% of writers. Thus, the percentage of women writers has decreased 2 percentage points in the last 2 years.

Figure 10 displays the gender of writers by network. Women comprised 25% (N=7) of writers at NBC, 22% (N=4) at ABC, 17% (N=2) at Fox, and 14% (N=3) at CBS.

Figure 10: Gender of Writers by Network

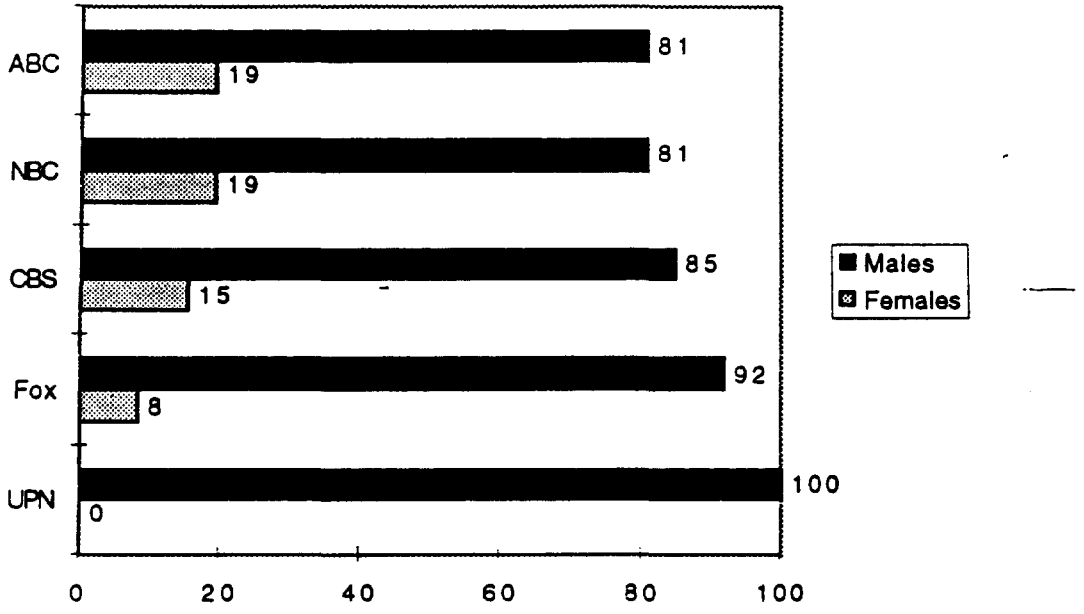


Editors. Women comprised 15% (N=11) and men comprised 85% (N=60) of editors in the programs considered. Women editors were more likely to work on dramas (25%, N=7) than situation comedies (9%, N=4).

Eighty-three percent (83%) of the programs considered had no female editors.

Figure 11 displays the gender of editors by network. Women comprised 19% (N=4) of editors at NBC, 19% (N=3) at ABC, 15% (N=3) at CBS, 8% (N=1) at Fox, and 0% at UPN.

Figure 11: Gender of Editors by Network



Directors of Photography. There was not a single woman director of photography on any of the programs considered.

One hundred percent (100%) of the programs considered had no female directors of photography.

The Relationship Between Women Behind the Scenes and Women On Screen

Prior research suggests that women behind the scenes create more female characters and imbue these characters with more powerful speech patterns than men working behind the scenes.. However, women working in different behind-the-scenes roles contribute to the on-screen presence and portrayal of female characters in different ways. The findings of this study document these relationships.

Female executive producers exert influence at a macro level, affecting the numbers of female characters featured in a program and hiring more female writers than male executive producers.

When a program had no female executive producers, female characters accounted for only 36% of all characters. When a program had at least one female executive producer, female characters accounted for 42% of all characters. The presence of one or more female executive producers increased the percentage of female characters by 6 points.

Programs with at least one female executive producer also tended to have greater numbers of female writers. On programs with no female executive producers, female writers accounted for only 13% of all writers. Females comprised 27% of all writers on programs with at least one female executive producer. The presence of at least one female executive producer on a program doubled the number of female writers.

These female writers, in turn, produced powerful dialogue for female characters. Female writers exert direct and significant influence on female characters by choosing their words. This study considered 4 markers of powerful dialogue: commands, interruptions, first words, and last words.

Figure 12 displays how female writers influence powerful language use by female characters. Note that the number of female characters on each program have been "controlled for." The percentages reflect these controls. This means that the differences in percentages between "no female writers" and "one or more female writers" cannot be

attributed to greater numbers of female characters. The differences reflect true power differences in language use by female characters.

Commands. Commands occur when one character tells another character what to do or not do. Coders counted the number of commands made by female and male characters throughout each program. As Figure 12 illustrates, female characters on programs with no female writers issued 37% of all commands. On programs with one or more female writers, female characters made 42% of all commands.

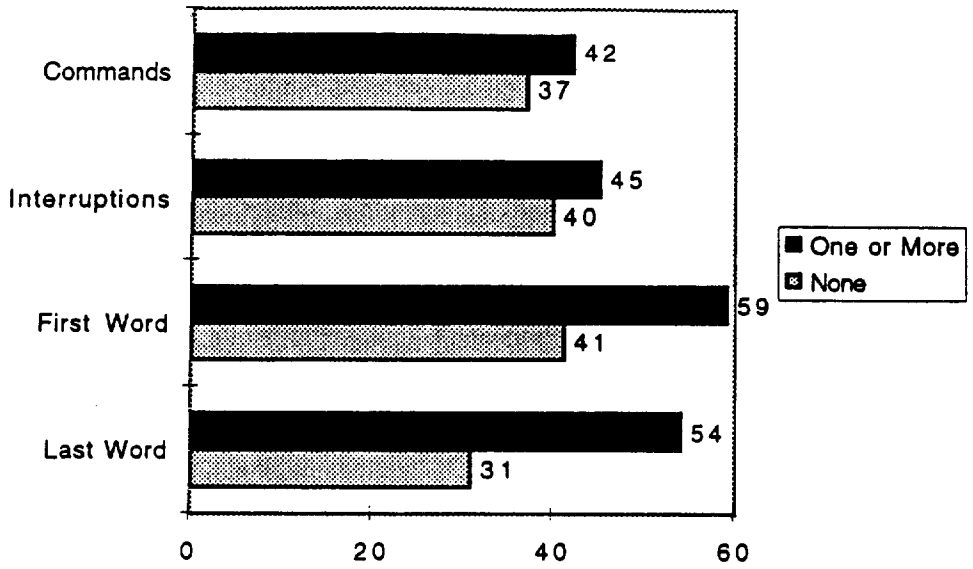
Interruptions. Interruptions occur when a listener speaks before a speaker has finished his or her thought. (Instances in which one character's dialogue overlaps another due to an accident in timing are not considered interruptions.) Coders counted the number of interruptions made by female and male characters throughout each program. As illustrated in Figure 12, female characters on programs with no female writers accounted for 40% of all interruptions. On programs with one or more female writers, female characters accounted for 45% of all interruptions.

Controlling Conversations. Characters can also control conversations by introducing topics of conversation (having the first word), and/or by having the last substantive word in a conversation. Coders counted the number of first and last words made by female and male characters in three selected conversations in each program. These conversations included the very first conversation in an episode, the first conversation after the first commercial break, and the first conversation after the second commercial break.

Figure 12 displays the findings. Female characters on programs with no female writers accounted for 41% of first words. On programs with one or more female writers, female characters accounted for 59% of all first words.

Female characters on programs with no female writers accounted for 31% of all last words in conversations. On programs with one or more female writers, female characters accounted for 54% of all last words.

Figure 12: Female Writers and Use of Powerful Dialogue by Female Characters



Conclusions

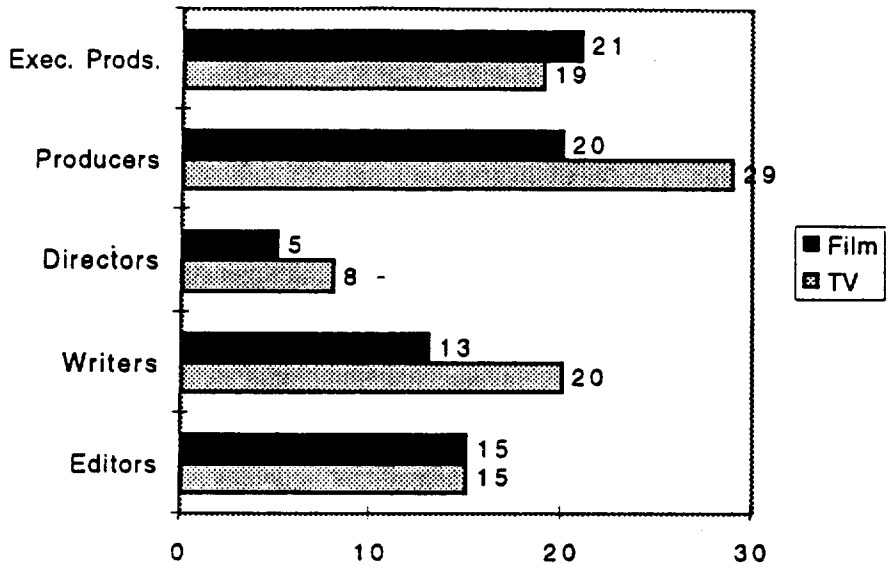
Women were underrepresented on screen and behind the scenes in the 1997-98 prime-time season. On screen, female characters accounted for 39% of all characters. At slightly less than 40% of all characters, the representation of women continues to improve slowly, up from 37% in the 1995-96 season. However, only 12% of these female characters were African-American, 2% were Asian, and 1% were Hispanic. Behind the scenes, women comprised only 23% of all executive producers, producers, directors, and writers in the top-rated programs considered. This represents a decline of 5 percentage points since the 1995-96 season.

An examination of the program genre analysis reveals that women in the creative behind-the-scenes community were more likely to work on situation comedies than dramas. No consistent behind-the-scenes employment patterns emerged from the network analysis.

Women working behind the scenes continue to make a difference in the on-screen portrayals of female characters. Specifically, programs with female executive producers feature greater numbers of female characters, while programs with female writers provide more powerful dialogue for female characters. However, these findings must be put in perspective. Eighty percent (80%) of the programs considered had no female writers. Sixty-nine (69%) of the programs considered had no female creators, 92% had no female directors, 83% had no female editors, and 100% had no female directors of photography.

The findings of this study are similar to the findings of a report released earlier this year by Women in Film entitled, "Employment and Equality: Assessing the Status of Women in the Top 100 Films of 1987, 1992, & 1997." Figure 13 offers a comparison of the behind-the-scenes employment of women in the television and film industries.

Figure 13: Comparison of Behind-the-Scenes Employment in Television and Film



*Film percentages reflect findings of the top 100 domestic grossing films released in 1997.

** Producer category for film includes producers and co-producers. Producer category for television includes producers, associate producers, co-producers, supervising producers, consulting producers, senior producers, and coordinating producers.

Women accounted for 21% of executive producers in the top 100 films of 1997 and 19% of executive producers in the top rated prime-time programs of the 1997-98 season. Women comprised for 20% of producers in the top 100 films of 1997 and 29% of producers in the top rated prime-time programs of the 1997-98 season. Women accounted for 5% of directors in the top 100 films of 1997 and 8% of directors in the top rated prime-time programs of the 1997-98 season. Women comprised 13% of writers in the top 100 films of 1997 and 20% of writers in the top rated prime-time programs of the 1997-98 season. In both the top 100 films and top-rated prime-time programs, women accounted for 15% of editors. There was not a single female director of photography working on a top 100 film or top-rated prime-time program.

Overall, neither the percentage of women working behind the scenes in the 1997-98 prime-time season nor the percentage of women working behind the scenes on the top 100 films of 1997 exceeded 25%.

Future research should investigate the reasons for the underemployment of women in behind-the-scenes roles in the television and film industries. The findings of this study suggest that women behind the scenes make a difference in on-screen portrayals. However, women in this creative community can only have an impact if and when they are employed.

Appendix A

Prime-time Programs in the Study

Ally McBeal (Fox)

Between Brothers (Fox)
Beverly Hills, 90210 (Fox)
Boy Meets World (ABC)
Brooklyn South (CBS)

Caroline in the City (NBC)
Chicago Hope (CBS)
Cosby (CBS)
Cybill (CBS)

Dharma & Greg (ABC)
Diagnosis Murder (CBS)
Dr. Quinn, Medicine Woman (CBS)
Drew Carey Show, The (ABC)

Early Edition (CBS)
Ellen (ABC)
ER (NBC)
Everybody Loves Raymond (CBS)

Family Matters (CBS)
Fired Up (NBC)
Frasier (NBC)
Friends (NBC)

George & Leo (CBS)
Grace Under Fire (ABC)
Gregory Hines Show, The (CBS)

Hiller and Diller (ABC)
Home Improvement (ABC)
Homicide (NBC)

Jag (CBS)
Just Shoot Me (NBC)

King of the Hill (Fox)

Law & Order (NBC)

Mad About You (NBC)
Melrose Place (Fox)
Michael Hayes (CBS)
Millennium (Fox)
Murphy Brown (CBS)

Naked Truth (NBC)
Nanny, The (CBS)
Nash Bridges (CBS)
NewsRadio (NBC)
Nothing Sacred (ABC)
NYPD Blue (ABC)

Party of Five (Fox)
Players (NBC)
Practice, The (ABC)
Pretender (NBC)
Profiler (NBC)
Promised Land (CBS)

Sabrina, the Teenage Witch (ABC)
Seinfeld (NBC)
Simpsons, The (Fox)
Sleepwalkers (NBC)
Soul Man (ABC)
Spin City (ABC)
Star Trek: Voyager (UPN)
Step by Step (CBS)
Suddenly Susan (NBC)

Teen Angel (ABC)
3rd Rock from the Sun (NBC)
Touched By An Angel (CBS)

Veronica's Closet (NBC)

Walker, Texas Ranger (CBS)
Working (NBC)

X-Files, The (Fox)