



This is to certify that WTVE-TV51 aired the following Public Service Announcement at the following dates & times:

Title: WORKING FOR A GREATER READING Length: 30 seconds

07/01/93 00:24:57A 05:52:58A 10:25:09P	07/12/93 02:50:26A	07/25/93 02:21:26A 07:54:09P	08/05/93 01:23:55A	08/18/93 04:54:20A 04:25:28P
07/02/93 04:25:57A 06:54:25P	07/13/93 03:23:17A 10:54:10P	07/26/93 01:23:24A 06:21:34A	08/06/93 04:22:31A 07:56:15P	08/19/93 02:22:12A 09:26:00P
07/03/93 02:23:30A	07/14/93 00:23:56A 05:56:26A	07/27/93 01:22:10A 05:23:13A 10:51:36P	08/07/93 03:22:29A 10:56:15A	08/20/93 04:24:00P
07/04/93 02:24:30A 04:53:50P	07/15/93 05:16:44A 11:22:26P	07/28/93 01:23:56A 05:26:40A 10:56:16P	08/08/93 03:25:57A	08/21/93 00:19:57A 10:20:09P
07/05/93 04:24:08A 06:54:24P	07/16/93 05:32:54A 11:25:30P	07/29/93 01:20:24A 05:24:13A 10:26:13P	08/09/93 04:22:53A 07:50:37P	08/22/93 03:24:37A
07/06/93 00:22:15A 05:53:42A 10:52:16P	07/17/93 05:19:30A 09:22:41P	07/30/93 03:21:20A 03:54:25A 06:54:30P	08/10/93 01:23:26A 06:19:27A 08:23:18A	08/23/93 02:24:47A 04:24:10P
07/07/93 02:50:25A 10:24:33P	07/18/93 05:20:00A 09:25:50P	07/31/93 01:45:52A	08/11/93 04:23:35A	08/24/93 02:51:50A
07/08/93 00:24:51A 09:55:00A 10:47:53P	07/19/93 05:23:56A 11:23:50P	08/01/93 01:52:46A	08/12/93 00:26:00A 05:56:29A 08:51:51A 11:46:24P	08/25/93 03:25:34A
07/09/93 02:55:13A 10:26:00P	07/20/93 04:23:56A 07:50:00P	08/02/93 03:24:06A 03:54:28A 06:54:26P	08/13/93 00:23:49A 05:25:57A 06:54:30P	08/26/93 01:24:31A 05:58:58A 05:27:00P
07/10/93 02:24:53A 04:50:00P	07/21/93 02:20:57A 11:23:01A	08/03/93 02:55:36A 09:22:09P	08/14/93 03:22:25A	08/27/93 03:56:06P
07/11/93 02:25:43A 04:56:22P	07/22/93 01:24:55A	08/04/93 02:55:36A 09:22:09P	08/16/93 00:20:03A 05:22:47A 06:59:20P	08/28/93 02:23:05A
	07/24/93 02:23:09A 07:45:48P			08/29/93 02:24:00A

READING EXHIBIT 25  
PAGE 48

24

ISSUES AND PROGRAMS REPORT

FOURTH QUARTER

1993

WTVE-TV 51

1729 NORTH ELEVENTH STREET

READING, PENNSYLVANIA 19604

COMPILED BY:

GEORGE MATTMILLER

OCTOBER, 1993

Will Rogers Institute - "Eat Right"

This cartoon-style PSA encourages people to eat right and to exercise in a way that feels good, inside and out.

16). ISSUE: HUNGER

Russ Reid Company for World Vision

This one-hour program, entitled "Africa's Famine", discusses the starvation in Africa and shows the relief work taking place to alleviate the problem. Viewers are also urged to send donations so the battle against starvation can be continued.

Healthbeat - #42 "Cancer Study"

The National Cancer Institute has landed an 88 million dollar study of cancer in older Americans considered to be the largest ever of its kind. The NCI is trying to determine whether widespread screening for certain cancers saves lives. This PSA also gives local health news on Temple University and American Cancer Society.

"Pain & Infertility: What Every Woman Should Know"

This 30 minute special was produced by Walter J. Klien Company Ltd.

17). ISSUE: MUNICIPAL/CIVIC CONCERNS

City of Reading - "Working For A Greater Reading"

WTVE-TV 51 produced this award-winning thirty-second Public Service Announcement for the City of Reading. Entitled "Working for a Greater Reading", the thrust of the PSA. was to boost city pride. The City of Reading is shown at work, with cuts of factories and offices. Mayor Warren Haggarty delivered the message that everyone is working together for a greater Reading.

Public Safety in Reading #1

This thirty-second Public Service Announcement was produced by WTVE-TV 51 in conjunction with the City of Reading and Metropolitan Edison Company. Entitled "Power Station", the PSA. is introduced by Reading Councilman Frank D. McCracken. Aimed at children, it says that if children lose a ball over a fence into a sub-station, that they are not to climb the fence to go in after it. Instead, a phone number is provided for them to call for assistance.

*Warren  
Hagarty*

ISSUES AND PROGRAMS REPORT  
THIRD QUARTER  
1994

WTVE-TV 51  
1729 NORTH ELEVENTH STREET  
READING, PENNSYLVANIA 19604

COMPILED BY:  
GEORGE MATTMILLER

Community Outreach - #89 "Reading Phillies #3"

This segment discusses the function of Mark Wallace in the Reading Phillies, the cooperation of the team and the community and a listing of upcoming events.

Community Outreach - #90 "Reading Phillies #4"

This segment discusses how the season is going so far, any stand out player and conversation about new teams in the league.

Community Outreach - #92 "Ride For Freedom"

The local chapter of POW/MIA Forget Me Nots, Inc. is organizing a "Ride For Freedom" motorcycle parade to bring awareness to POW's still missing today. Many local Vietnam Veterans will join together on Sunday, August 28, 1994 for this event. Host-Doug Didyoung.

Fair Housing

This PSA is reminding people that you can not discriminate against people for jobs of work because of the color of their skin or nationality. Sponsored by PA Heritage Affairs Commission & PAB.

Santoni/Labor

This PSA features local Representative Dante Santoni. He is asking the public to remember over the holiday weekend that Labor Day was founded to celebrate the working Americans.

Historical/Labor

This PSA, from the Labor Institute, tells what Labor Day is and what it means to America. The day celebrated as Labor Day came into existence in 1884 when Grover Cleveland declared it a national holiday.

Minutes With The Mayor #1 "First Show Objectives"

This show provides a forum to the public to ask questions of Mayor Warren Haggarty about an issue dealing with the City of Reading or Municipal Government in general. This first show establishes its purpose and asks the viewer to write in.

46). August 8, 1994 - Following months of setting up a shoot date, WTVE welcomed Mr. Warren Haggerty into the studio for an initial taping of the public service segment "Minutes with the Mayor". Dan's chief contact at the Mayor's Office was the Mayor's Assistant, Mr. Steve Whitney. The purpose of the initial taping was to introduce the format. A telephone number was put up on the screen for where to call to request other topics of discussion. Dan arranged with the Mayor's Office to shoot these segments on an ongoing basis.

47). August 8, 1994 - The Republican candidate for Lt. Governor stopped in the station to introduce himself and find out about any political programs that may exist. He left information on his campaign and agreed to appear on public service shows in the future, specifically talking about the Pennsylvania Department of Labor.

48). August 10, 1994 - Dan Bendetti spoke with Mr. Doug Didyoung, President of the Reading chapter of Forget-Me-Nots, a group dedicated to memorializing veterans who died in the Vietnam War. Mr. Didyoung contacted Dan Bendetti, as he is interested in promoting an upcoming event. Sunday, August 21, 1994, the first annual "Ride for Freedom" took place in Reading. The event consisted of a group of motorcyclists who rode to the local Vietnam Memorial to pay tribute to the Vietnam Veterans who died in the War or never returned. Dan asked Mr. Didyoung into the studio on August 17, 1994 to shoot two segments for "Community Outreach". The shows encompassed the following topics:

- a). Motorcycle "Ride for Freedom" - specific
- b). General overview of "Forget-Me-Nots" and their work to memorialize those who died in the Vietnam War or who have never returned

WTVE produced and aired "A Time of Healing" to pay tribute to Vietnam veterans. The hour-long program aired initially in previous quarters. WTVE has always been supportive of the efforts of the "Forget-Me-Nots" and other organizations paying tribute to the efforts of veterans in Vietnam and other wars.

49). August 18, 1994 - Dan met with Mr. Ron Rouse, Publisher of the M Voice about producing local programs focusing on minorities. There were many phone calls back and forth for the next few weeks until the shoot date was arrived at. The initial taping in WTVE's studios featured Mr. Rouse interviewing Mr. Steve Little on September 7, 1994. The name of the program is "Minority Voices" and will continued to be aired on an ongoing basis.

**Exhibit 26 DEPOSITION OF SANDRA KISSINGER  
OCTOBER 20, 1999, 11:50 A.M.**

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

In re: Applications of : MM Docket No. 99-153  
READING BROADCASTING, INC. :  
For Renewal of License of : File No. BPCT-940407KF  
Station WTVE (TV), Channel :  
51, Reading, Pennsylvania :  
and : File No. BPCT-940630KG  
ADAMS COMMUNICATIONS :  
CORPORATION :  
For Construction Permit for :  
a New Television Station :  
to Operate on Channel 51, :  
Reading, Pennsylvania :

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DEPONENT: SANDRA KISSINGER

DATE AND TIME: Wednesday, October 20, 1999  
at 11:50 a.m.

LOCATION: Comfort Inn  
2200 Stacy Drive  
Reading, Pennsylvania

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Berks Court Reporting Service  
By: Lori A. Dilks, RPR  
12 Pacific Avenue  
Sinking Spring, Pennsylvania  
(610) 678-9984

**COPY**

Federal Communications Commission

Docket No. MM-49-153 Exhibit No. 26

Presented by Reading

Disposition

Reporter John Del Pno

Date 6-12-00

Identified  
Received  
Rejected

1 APPEARANCES:

2 HOLLAND & KNIGHT, LLP  
 3 By: Thomas J. Hutton, Esquire  
 4 2100 Pennsylvania Avenue, N.W.  
 Suite 400  
 Washington, D.C. 10037-5564

5 Representing Reading Broadcasting, Inc.

6  
 7 BECHTEL & COLE, CHARTERED  
 By: Gene A. Bechtel, Esquire  
 1901 L Street, N.W., Suite 250  
 8 Washington, D.C. 10036

9 Representing Adams Communications

10

11 STIPULATION: It has been stipulated by and between  
 12 counsel that they waive the sealing of the transcribed  
 testimony by the witness, and the filing of the original  
 13 with the Court, and all objections, except as to form,  
 until the time of trial.

14

15

16 I N D E X

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17 <u>WITNESS</u>	<u>EXAMINED BY</u>	<u>PAGE</u>
18 Sandra Kissinger	Mr. Bechtel	3
	Mr. Hutton	11

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EXHIBITS

21 <u>NUMBER</u>	<u>DESCRIPTION</u>	<u>PAGE</u>
22 Kissinger 1	Notice of Deposition	3
23 Kissinger 2	Subpoena	3
24 Kissinger 3	Programs/Issues Reports	12

25

P R O C E E D I N G S

SANDRA KISSINGER

was called as a witness and, having been first duly sworn by the Reporter-Notary Public, was examined and testified as follows:

BY MR. BECHTEL:

Q. For the record, would you state your name and residence address, please?

A. Yes. Sandra M. Kissinger, 1409 Delaware Avenue in Wyomissing, Pennsylvania, 19610.

Q. My name is Gene Bechtel. I'm counsel for Adams Communications Corporation. Mr. Hutton is counsel for Reading Broadcasting Company. If any of my questions are unclear, please say so. If Mr. Hutton interjects after a question, wait until we're done before you answer. And if you need a break, just let us know.

A. Okay.

(Whereupon, the Reporter marked the following exhibits for identification: Kissinger Exhibit No. 1, Notice of Deposition; and Kissinger Exhibit No. 2, Subpoena.)

BY MR. BECHTEL:

Q. If you will, just take a look at those two. I have a quick question here. Exhibit 1, did you --

1 A. This is what I saw --

2 Q. I'm sorry.

3 A. -- what was mailed to me. This is what was  
4 mailed (indicating). Yes. I have that with me, my  
5 copy.

6 Q. And have you been served that Subpoena,  
7 Exhibit 2?

8 A. Yes, I was.

9 Q. Did you bring any documents with you?

10 A. The only document I have is basically my  
11 personal knowledge because I'm not -- I'm really not  
12 familiar as to what this is with regards to, but  
13 basically in just a very short term I just put down what  
14 my dealings were with TV 51.

15 Q. This is something you prepared after you  
16 received our notices. Is that correct?

17 A. Yeah. I mean, it's just basically my  
18 dealings with Channel 51.

19 Q. You can keep that. I wasn't asking for  
20 that. I was asking for documents back in the earlier  
21 time period.

22 A. Yeah. Unfortunately, I didn't start to  
23 work for the American Red Cross until October 28th of  
24 1991. So I know your time span was '89 through '94, but  
25 my personal dealings is that I've only started there

1 October 28th, 1991.

2 Q. So it was for the past -- from that date  
3 until August of '94, you have some knowledge about that  
4 time period.

5 A. Yes.

6 Q. How long have you lived in the Reading  
7 area?

8 A. All my life, which would be 51 years as of  
9 Sunday.

10 Q. I didn't ask you that.

11 A. I offered it.

12 Q. And what was your role with the Red Cross  
13 during the period that we just identified?

14 A. Basically, I started out as Youth Services  
15 Coordinator for the Berks County Chapter American Red  
16 Cross, which dealt with being in the school systems.  
17 And later on I moved into the Communications Director  
18 role. Actually, I started as Communications Specialist  
19 and then worked my way up to Communications Director for  
20 the Berks County Chapter American Red Cross.

21 Basically what I did was worked with the  
22 media of all sorts, whether it be TV, radio, news print,  
23 trying to promote Red Cross in the community and let  
24 people know what we do and who we are and that we're out  
25 there to help people.

1 Q. During that period of time, '91 to '94  
2 basically, did you have a TV set in your home?

3 A. Yes.

4 Q. Did you watch it?

5 A. Yes.

6 Q. Quantify just, if you could, the extent to  
7 which you watched television and the kinds of shows or  
8 programs that you watched during that time frame, if you  
9 can.

10 A. Boy, that's really stretching my memory  
11 now. Well, with working full-time most of my dealings  
12 are with news or, of course, working for the Red Cross I  
13 deal a lot with the weather channel because we are  
14 involved with national disasters and local, as well.

15 Local programming also, especially since we  
16 have more TV stations now in Berks County and normal  
17 programs, the sitcoms, half-hour programs,  
18 documentaries, whatever, kind of an assortment.

19 Q. Did you watch Channel 51 during that time  
20 period?

21 A. Yes, occasionally, especially when I was  
22 having -- knew that something was going to be on about  
23 Red Cross. The company was gracious enough to help us  
24 out a lot during that time frame with regard to local  
25 disasters that we had, being able to do, like,

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1 infomercials. We had a fire on Moss Street, and it  
2 was -- it actually involved a two-city block area, and  
3 they were able to help us get -- promote information  
4 about that and what we were doing.

5 Q. I heard local disasters, and I heard  
6 infomercials.

7 A. I call it an infomercial. I don't know  
8 what the correct terminology is.

9 Q. Then I think you said something after  
10 infomercial, and I didn't hear that.

6

11 A. What did I say? I helped with local --  
12 when we had the Moss Street fire, they helped --

13 Q. That's what I didn't hear.

14 A. The Moss Street fire, which you probably  
15 are not familiar with because you're not from the area,  
16 but it was a whole city block of buildings that burned  
17 down, and it was a real major disaster for the Berks  
18 County community. And the Red Cross had to assist a lot  
19 of people in, basically, maybe a three, four city block  
20 area. And they were -- they would do a promotion where  
21 they would help us get information across to the  
22 community about what we're doing.

23 It's basically myself, possibly, or one of  
24 our emergency services directors would be in and talking  
25 about what the Red Cross is doing in the community and

7

1 how we're helping these people and putting information  
2 out to them. Not only did they do that, but the other  
3 TV stations and newspapers did the same thing. They're  
4 very kind and generous to the non-profits in the  
5 community, especially Red Cross.

6 Q. How long -- when you refer to  
7 infomercial --

8 A. It was very short.

9 Q. -- how long a time would that be? How long  
10 would the program be or whatever it is be?

11 A. We would do a taping of it, of course, that  
12 takes a couple takes depending on what that -- you know,  
13 with mistakes or whatever.

14 Q. Sure.

15 A. I can't, to be honest, remember. It could  
16 have been like a 60-second type thing, or they could  
17 have even done a half-hour show if we were talking about  
18 something in particular.

19 Q. Do you recall a half-hour show on Channel  
20 51 during the period we're talking about?

21 A. It might have been after that period.

22 Q. I'm sorry?

23 A. It might have been after '94.

24 Q. But you do recall a 30-minute program?

25 A. Yes.

1 Q. And do you know, did it have a title?

2 A. I'm trying to recollect what -- there could  
3 have been numerous things. One, in particular, could  
4 have been about our health courses that we are putting  
5 out for the community. My contact was with Kim Bradley  
6 who was very helpful in promoting safety in the  
7 community and letting people know about our courses. I  
8 would tend to think, more or less, it would be on  
9 something like a disaster-related event in history.

10 Q. Now, let me ask you about disaster-related  
11 events. Were those in the 60-second range, or were  
12 those longer; that is to say, the announcement or the  
13 interview or whatever it was that the station did for  
14 the Red Cross, how long was that?

15 A. I would think the most would have been  
16 the -- what I call the infomercial, more like the 60  
17 second or -- I don't know if it was even 90 second or 30  
18 second. But I know at one point in time there was a  
19 longer time span where we spent talking about -- it was  
20 for a major disaster, I just can't remember which one it  
21 would have been -- talking about what the Red Cross is  
22 doing and how the people in the community can help and  
23 that sort of thing.

24 Q. This really is kind of unfair to just hit  
25 you broadside like this. I believe the station does

1 have rather complete records as to things that were  
2 done.

3 A. I'm sure they do.

4 Q. I have a suspicion that in just about three  
5 minutes you're going to see it from Mr. Hutton, and  
6 perhaps some of these things will be --

7 A. It just seems like it's been so long, but  
8 they've always been good with when we've called them  
9 about trying to get -- you know, if we needed to get  
10 something across to the community, they were always very  
11 generous in helping the Red Cross.

12 Q. During this approximate three-year period  
13 we're talking about, Channel 51 was an affiliate of the  
14 Home Shopping Network.

15 A. I remember that.

16 Q. I said that because that's a frame of  
17 reference. So leaving aside the Home Shopping Network  
18 stuff, other than what you have talked to us about,  
19 including the details that we'll flesh out hopefully  
20 with the exhibits, to your personal knowledge and  
21 observation, how did Channel 51 serve the needs and  
22 interests of Reading?

23 A. I would believe basically by saying that --  
24 promoting and -- not promoting, I want to scratch that  
25 word -- helping the Red Cross get the word out, I guess.

1 would be one of my quick comments. It just seemed like  
2 any time we had a need, that we needed information to be  
3 distributed to the people in the community, they were  
4 willing to help us out. Whether it was through health  
5 and safety courses, which was prevention,  
6 disaster-related things or an event that we were going  
7 to be having or holding, they were willing to help us in  
8 whatever way they could.

9 I don't think it was as much as the TV  
10 stations are doing now because they're into the news --  
11 newsy end of it, the Channel 5 and the Channel 69's that  
12 we have now, but they've just always been very helpful.  
13 I've never had any problems in dealing with them.

14 Two people that I can remember dealing with  
15 were Dan and Kim Bradley, basically. And we would go  
16 into the studio, and they would just be very helpful and  
17 cooperative.

18 Q. I don't want to cut you off. I want you to  
19 say everything you want to say.

20 A. Other than that, I really don't know a  
21 whole lot of anything else, which kind of surprised me  
22 that I was subpoenaed, but...

23 MR. BECHTEL: Thank you. That's all I  
24 have.

25 THE WITNESS: Okay.

1 BY MR. HUTTON:

2 Q. You mentioned Kim Bradley and you mentioned  
3 Dan. Was that Dan Bendetti?

4 A. You know, I never remember his last name.  
5 I just know that they were just always really nice  
6 people, and we would talk on a -- whatever, a need-be  
7 type of basis.

8 Q. And apart from the Red Cross, are you  
9 familiar with any other organizations that the station  
10 assisted in a similar fashion?

11 A. To be honest with you, I'm not. I kind of  
12 live in, I guess, my own little shell. But being in the  
13 Red Cross, you kind of live it and breathe it and eat  
14 it, and sometimes it's seven days a week. I get calls  
15 in the middle of the night for fires and -- so my mind  
16 is kind of a tunnel vision, so to speak, but that's the  
17 type of job I have. You just live and breathe what you  
18 do.

19 MR. HUTTON: Okay. That's fair enough.  
20 I'd like to mark this as Kissinger Exhibit 3.

21 (Whereupon, the Reporter marked Kissinger  
22 Exhibit No. 3 for identification, Programs/Issues  
23 Reports.)

24 BY MR. HUTTON:

25 Q. This is a document you have not seen

1 before, so we'll take a few minutes to go through it.  
2 It consists of excerpts from WTVE's quarterly issues and  
3 programs reports for the period from the second quarter  
4 of 1991 until the third quarter of 1994. And some of  
5 this may predate your involvement with the station, but  
6 we can walk through it and you can tell me what you  
7 recall.

8 The first reference I see to the Red Cross  
9 is from the second quarter of 1991. There's a reference  
10 to a public service announcement about the Red Cross's  
11 swimming program.

12 A. That's correct. We do water safety  
13 programs in the communities all over Berks.

14 Q. Do you think this accurately describes the  
15 announcement that was run?

16 MR. BECHTEL: I hate to interrupt but you  
17 asked her, does she think what it actually describes for  
18 a period when she wasn't working there. I really don't  
19 want to break your timing or anything.

20 MR. HUTTON: I understand, but she may have  
21 gained familiarity after she started working there with  
22 what was done beforehand.

23 MR. BECHTEL: I'll object to any question.  
24 You go ahead and ask whatever you want. I'll object to  
25 question until we get up to the time when she started

1 working there.

2 BY MR. HUTTON:

3 Q. Do you have any familiarity with the  
4 announcement that's described here?

5 A. Yes. It was actually probably generated  
6 through our Youth Services Department and our Health and  
7 Safety Services together, which is water safety in  
8 general.

9 Q. And to your knowledge, does this  
10 description accurately summarize the announcement?

11 A. Yes. I'm sure that was the small  
12 30-second -- the PSA's that they were doing.

13 Q. The same PSA is referenced in the third  
14 quarter of 1991.

15 A. Right. They had a tendency to run them at  
16 various times, time frame period with various things  
17 that I was familiar with, that I put or sent to them.  
18 So that would probably be the example here. They maybe  
19 would run it one week and then another and maybe in a  
20 time frame of a month or so. So I could see why it  
21 would be reproduced again.

22 Q. The next one I see is in the second quarter  
23 of 1992. There's a reference to another swimming  
24 related spot.

25 A. Second quarter?

7  
8

1 Q. Second quarter.  
2 A. I must have missed that. Yeah, I did.  
3 Q. Are you familiar with the spot that's  
4 described there?  
5 A. It sounds like something National would put  
6 out, which is most of our -- PSA is basically -- I would  
7 love to take credit for a lot of those things, but most  
8 of the PSA's are derived through our National  
9 Headquarters in Washington D.C., and it's basically  
10 distributed to all the chapters across the country so we  
11 at least have a format to go from. We can alter them  
12 and change them to our own local communities, but this  
13 is probably through an ad campaign that the National Red  
14 Cross did on swimming safety.  
15 Q. I guess I'm curious as to how it would have  
16 come to the attention of WTVE. Would it have been  
17 through the National Headquarters?  
18 A. No. It would have been through the Berks  
19 County Chapter.  
20 Q. And I don't expect you to know on the next  
21 page exactly when this spot ran, but that's a record  
22 that the station kept of when the spot ran.  
23 A. Okay.  
24 Q. The same with the next page.  
25 A. All right.

1 Q. Now, the next reference I see to the Red  
2 Cross is in the third quarter of 1992 there is a meeting  
3 of an unrelated group, it appears, at the Red Cross  
4 headquarters.

5 A. That's correct. We used to hold a Lupus  
6 support group. One of our volunteers had lupus and,  
7 basically, we offered our Chapter as a meeting room for  
8 the community to meet there. It does not meet there at  
9 this particular time, in 1999, but it did for several  
10 years. Now I think they have a bigger group that has  
11 formed.

12 Q. And so this announcement of this meeting,  
13 would that have been coordinated through the Red Cross  
14 or through the lupus support group?

15 A. No. It would be -- well, you know, I'm not  
16 sure on that one. I can't honestly answer that one, to  
17 be honest with you.

18 Q. That's fine.

19 A. I can interject that we hold -- the Berks  
20 County Organ and Tissue Donor Coalition is held at our  
21 Chapter. It's really a program of the National  
22 Transplant Program which is in Philadelphia, but we do  
23 the public service announcements or any kind of media  
24 information is sent out through the Red Cross. I can  
25 tell you that now. I don't know at this particular time

1 if that was the same, but I know how that operates.

2 Q. The next reference to the Red Cross I see  
3 is from the fourth quarter of 1992. There are a couple  
4 of references here about dealings that Kim Bradley had  
5 with the Red Cross.

6 A. For Health Beat, right.

7 Q. Are you familiar with what's described  
8 here?

9 A. Basically, yes. I was working at that time  
10 and basically Mary Young, at that particular point in  
11 time, was in charge of -- well, she was the bookkeeper  
12 and kind of did a lot of other things, but she kind of  
13 coordinated some of the media activities and basically  
14 fund raisers, activities, anything that's going on in  
15 the Red Cross is something that TV 51, you know, or any  
16 other affiliate, whether it's a print media or whatever,  
17 would help us with.

18 Like I stated before, the media in Berks  
19 County is really good to the Red Cross. Red Cross's  
20 belief and values are -- and this comes from our  
21 National Headquarters -- is that we don't pay for  
22 advertising. We either get it donated -- and that's  
23 how -- that's how we use our funds.

24 We let people know that basically when they  
25 give money to the Red Cross it goes towards services and