

- e). Water is the safest liquid to drink during heat emergencies; avoid drinks with alcohol or caffeine
- f). Eat small meals and more often
- g). Avoid using salt tablets unless directed by a physician

The campaign also focused on signals of heat emergencies:

- a). Heat exhaustion is signaled by cool, moist, pale or flushed skin, including heavy sweating, headaches, nausea or vomiting, dizziness and exhaustion - though body temperature remains near-normal
- b). Heat stroke is signaled by hot, red skin, changes in consciousness, rapid, weak pulse and rapid, shallow breathing; call 911 immediately - symptoms also include very high body temperature and dry skin, unless person is sweating from heavy labor

16). August 13, 1994 - Kim Bradley spoke again with Sandi Kissinger of the American Red Cross as far as scheduling upcoming classes for heat exhaustion and heat stroke on WTVE's Community Calendar; on September 10th, Ms. Kissinger sent Kim Bradley additional non-profit classes offered by the American Red Cross to promote on the station's Community Calendar.

17). August 27, 1994 - Kim Bradley contacted the National Museum of Women in Arts in Washington, DC about their current campaign entitled "Picture What Women Do". The Junior League International of Reading sent Kim some information earlier about what the exhibit entailed and what Kim knew about it. Kim had them send the information. The exhibit "Picture What Women Do" is a photographic portrait of women's lives across America and runs September 13-October 13, 1994. Proceeds from the exhibit sponsor the following non-profit organizations:

- \*Alzheimers Association
- \*National Breast Cancer Coalition
- \*Child Care Action Campaign
- \*Association of Junior Leagues International
- \*Metro Manhattan Chapter of the Links
- \*MS Foundation for Women
- \*National PTA
- \*9-5 National Association of Working Women
- \*YWCA

The contact is Ms. Sally Anderson. Kim took the information and ran an announcement in WTVE's Community Calendar. When more footage is available, the station will possibly promote upcoming events using interviews and stock footage.

**Exhibit 27 DEPOSITION OF LINDA WITMAN  
OCTOBER 20, 1999, 12:50 P.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: LINDA WITMAN

DATE AND TIME: Wednesday, October 20, 1999  
at 12:50 p.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-94123 Exhibit No. 27

Presented by Reading

Disposition

Reporter John DeLano

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  
 4 Washington, D.C. 10037-5564

5 Representing Reading Broadcasting, Inc.

6 BECHTEL & COLE, CHARTERED  
 7 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  
 13 testimony by the witness, and the filing of the original  
 with the Court, and all objections, except as to form,  
 14 until the time of trial.

14

15

16 I N D E X

16

17 <u>WITNESS</u>	<u>EXAMINED BY</u>	<u>PAGE</u>
18 Linda Witman	Mr. Bechtel	3
	Mr. Hutton	8
19	Mr. Bechtel	15

20

21 EXHIBITS

21

22 <u>NUMBER</u>	<u>DESCRIPTION</u>	<u>PAGE</u>
23 Witman 1	Notice of Deposition	3
24 Witman 2	Subpoena	4
25 Witman 3	Programs/Issues Reports	9

1                                    P R O C E E D I N G S

2                                    LINDA WITMAN

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

6        BY MR. BECHTEL:

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

9                    A.        Linda H. Witman, 108 Van Street, Leesport,  
10       PA, 19533.

11                   Q.        And my name is Gene Bechtel, and I'm  
12       attorney for Adams Communications Corporation. Mr.  
13       Hutton is the attorney for Reading Broadcasting Company.

14                                If any of my questions are unclear, say so.  
15       If Mr. Hutton interjects, don't answer until we get  
16       through talking back and forth, or if I object when he  
17       talks, the same way. And if you need a break, let us  
18       know.

19                    A.        Fine. Thank you.

20                    Q.        Now, may I assume that you received a  
21       notice in the mail to appear for this deposition?

22                    A.        Yes.

23                                (Whereupon, the Reporter marked Witman  
24       Exhibit No. 1 for identification, Notice of Deposition.)

25       BY MR. BECHTEL:

1 Q. Were you also served a Subpoena?

2 A. Yes.

3 (Whereupon, the Reporter marked Witman  
4 Exhibit No. 2 for identification, Subpoena.)

5 BY MR. BECHTEL:

6 Q. Did you have any documents and bring them  
7 with you in response to the Subpoena?

8 A. I do not have any documents.

9 Q. You're here to answer some questions  
10 regarding programming on Channel 51, WTVE, during a  
11 period from 1989 to 1994, a five-year period that was in  
12 the documents, August 1, '89 to August 1, '94.

13 A. Yes.

14 Q. To the extent that you can focus it on that  
15 time frame, that's what we'd like you to do.

16 How long have you lived in the Reading  
17 area?

18 A. All my life.

19 Q. You don't need to say the years.

20 A. I'm not going to. A gentleman never asks.

21 Q. The only reason I said that, the last  
22 witness volunteered it. I didn't ask.

23 A. I was born in Birdsboro, so I consider that  
24 the Reading area.

25 Q. Sure. And you have been identified as

1 having activities relating to the March of Dimes. Is  
2 that the case? Is that true?

3 A. I'm the Executive Director of the Berks  
4 County Chapter, and it will be 15 years in November.  
5 There, I volunteered lots.

6 Q. That will get us through a little quicker.  
7 The answer to this probably is obvious. What does the  
8 Executive Director do?

9 A. You'd be surprised. Everything from  
10 financial management, fund raising, staff development  
11 and evaluation, et cetera, et cetera.

12 Q. Are you active in other civic areas or  
13 community work?

14 A. No.

15 Q. I didn't hear. I'm sorry.

16 A. No.

17 Q. During this five-year period we're talking  
18 about, did you have a TV set in your home?

19 A. Yes.

20 Q. Did you have one in your office?

21 A. Not one that's hooked up. We have a TV  
22 with a VCR that we use only for videos. It can be  
23 carried out of the office, connected up and show videos.

24 Q. During that time frame, did you watch  
25 television?



1 A. Yes.

2 Q. Can you quantify generally how much and the  
3 types of programs you liked to watch?

4 A. Very little, 'cause I'm very busy.

5 Q. And when you do watch it, what would  
6 motivate you to --

7 A. Back during that time frame, I would say  
8 news, movies, that type of thing.

9 Q. During that time frame, Channel 51 was Home  
10 Shopping Network.

11 A. Yes.

12 Q. Did you watch the station then?

13 A. I don't watch it -- I did not watch it that  
14 often, maybe periodically, particularly when we were  
15 working with them, I admit, because they had things on  
16 television for us so we always made it a point to look  
17 and watch ourselves on television.

18 Q. For sure.

19 A. Yes.

20 Q. Describe what the television station,  
21 during that time frame, did for you folks.

22 A. All right. For a number of years I went  
23 -- accompanied by volunteers -- and they actually made  
24 like a three-minute, I guess you would call it, an  
25 advertisement, a public service, three-minute

13

1 promotional tape on an event that we were having.

2 Q. Okay.

3 A. I don't know how much more you want than  
4 that.

5 Q. Any other type of thing that they did for  
6 you?

7 A. Yes. They also -- they also every year for  
8 many years and continue to do so, is our National Office  
9 does up a promotional piece on Walk America which is our  
10 most important and largest fund raising event. And what  
11 you can do with that is go directly to stations with  
12 this PSA made up, cable ready, and then they would tag  
13 it. For more information call the Berks County Chapter  
14 at this number.

14

15 So they also played those for us probably  
16 off and on over -- at least a month to six weeks before  
17 the event. So there was actually two events that they  
18 helped us with.

19 Q. Any other type of thing they did for you  
20 other than the two types that you've mentioned?

21 A. Those are the only two I can think of.  
22 During that time frame?

23 Q. Yes.

24 A. I can tell you about what's going on now,  
25 but I don't believe you want that.

1 Q. No. We're focusing on this time frame.  
2 Thank you very much.

3 A. You're welcome.

4 BY MR. HUTTON:

5 Q. I'm going to follow up with a few  
6 questions.

7 What was the first event you mentioned that  
8 WTVE helped with?

9 A. It was a dancing event. That is an event  
10 unique to our Chapter, therefore, there would not be any  
11 ready made tapes. Do you understand what I'm saying?

12 Q. Yes.

13 A. Where Walk America is a national event, a  
14 PSA is made that is given to every Chapter across the  
15 United States. This dancing event was unique to our  
16 Chapter, and that's why they cut the tape for us.

17 Q. And they aired the tape on their station  
18 prior to the event?

19 A. Leading up to the event, advertising it,  
20 encouraging people to participate. It was an interview  
21 with me and the Chairman of the event, that type of  
22 thing.

23 Q. And what was the significance of the event  
24 to your organization?

25 A. To raise money.

1 Q. There is a document here that you have not  
2 seen before. I'm going to introduce it as Exhibit 3.

3 (Whereupon, the Reporter marked Witman  
4 Exhibit No. 3 for identification, Programs/Issues  
5 Reports.)

6 THE WITNESS: Did you want me to go through  
7 this whole thing?

8 BY MR. HUTTON:

9 Q. I'll walk you through it.

10 A. I see there's some research things marked  
11 on here.

12 Q. This document consists of excerpts from  
13 WTVE's quarterly issues and programs reports beginning  
14 in the fourth quarter of 1991 and ending in the third  
15 quarter of 1994. And if you flip to the third page of  
16 that, there are two March of Dimes PSA's referenced  
17 there.

18 A. Um-hum. They were on prematurity and  
19 research, I see.

20 Q. Do you recall those PSA's?

21 A. In looking at it now, absolutely, and  
22 there's the staff person's name that wrote the letter.  
23 Earlier I was asked about documentation and did not  
24 elaborate but want you to know the -- what we would have  
25 is this, this thank you letter. But if you'd see the

1 size of our office, you can understand why we don't -- I  
2 don't keep that type of thing that many years.

3 The fund raising books, you know, and  
4 manuals get so big so we only keep them like three or  
5 four years. But, yes, Sheri Wolfrum was the staff  
6 member who delivered the PSA announcements. And that's  
7 what they're doing for us right now, PSA's on  
8 educational issues for women.

9 Q. Reading the descriptions of the two PSA's  
10 described here, to the best of your knowledge, are those  
11 descriptions accurate descriptions of what WTVE did?

12 A. Yes.

13 Q. And the research PSA also appears in the  
14 first quarter of 1992.

15 A. Yes.

16 Q. And in the first quarter of 1993 there is  
17 an entry about the March of Dimes and particularly the  
18 Walk America event.

19 A. Yes. Doug Smith was our Chairman at the  
20 time.

21 Q. Reading that description, does that appear  
22 to be an accurate representation of what WTVE did?

23 A. Yes.

24 Q. Following that, there is a letter from you  
25 to Kim Bradley dated February 1, 1993. In the second

14

1 paragraph of that letter you mention certain  
2 three-minute segments. Did those segments ever air on  
3 the station?

4 A. Yes.

5 Q. Do you recall the topics that they covered?

6 A. No. They're all -- any PSA we take that is  
7 not related to Walk America or it's not the Dancing for  
8 Dimes is going to have to do with either prenatal care,  
9 the adverse effects of smoking, alcohol and drugs on the  
10 unborn. They're all going to be health issues related  
11 to women having a healthy baby. But what exactly were  
12 they? I don't know.

13 Q. Okay. That's fine. And the following page  
14 is a schedule that the television station prepared  
15 referencing News to You, March of Dimes. Do you recall  
16 what that refers to?

17 A. No.

18 Q. Turning now to the second quarter of 1993,  
19 on the page marked Page 20, there's a reference to March  
20 of Dimes, Berks County Chapter, Hallway. Do you recall  
21 that item?

22 A. I was skipping ahead. I have to find the  
23 page.

24 Q. It's the second quarter of 1993.

25 A. Here's News to You (indicating).

15

1 Q. It's the next page.

2 A. (Witness reviewed document.)

3 It's a tape relating to, as it says here,  
4 things that men can contribute -- Dad, it's your baby,  
5 too, that kind of thing -- in a positive way to help the  
6 birth outcomes. We have brochures on it now.

7 Q. Reading that description, does that appear  
8 to be an accurate description of what WTVE did?

9 A. I don't even -- I don't remember exactly  
10 what it said on the tape. I just know that it is a  
11 March of Dimes PSA. And in working with them over the  
12 years they did so many things for us, but it's  
13 impossible for me so say, well, I remember exactly what  
14 Hallway -- but absolutely, yes, they did it or they  
15 wouldn't have known about it. It would not be on this  
16 paper if they had not known -- I mean, if I wouldn't  
17 have gone to them with the tape.

18 Q. Okay. That's fair enough.

19 On the next page there's a reference at the  
20 top of the page to News to You, March of Dimes, and it  
21 references some work with the Walk America campaign.

22 A. Yes.

23 Q. Does that appear to be accurate?

24 A. Yes. Doug Smith was our Chairman for two  
25 years, so this would have been during his second year as

1 Chairman.

2 Q. And the following page appears to be a  
3 schedule of when that aired.

4 A. Yes. That's the dancing event I was  
5 talking about previously. Is that what you're referring  
6 to, 9 at the bottom?

7 Q. I'm getting there. I'm getting there.

8 A. Jumping ahead.

9 Q. Skipping -- I apologize for being slow.  
10 Skipping to the third quarter of 1994, at the bottom of  
11 the page there's a description about the Dancing for  
12 Dimes project and the Walk America event, and I would  
13 like you to review that and let me know if that appears  
14 to be an accurate description of what the station did.

15 A. (Witness reviewed document.)

16 MR. BECHTEL: If I may interject, I think  
17 we've gone beyond the prescribed time frame so I would  
18 object to anything after August 1 of 1994.

19 MR. HUTTON: That's fine.

20 BY MR. HUTTON:

21 Q. You can go ahead and answer the question.

22 A. Yes. It's correct.

23 Q. Apart from what's been described, do you  
24 recall any other efforts by the station or its personnel  
25 to promote the March of Dimes or the causes that the

1 March of Dimes is interested in?

2 A. In looking at the information that is here  
3 and the things that we discussed, here is the proof that  
4 they did a lot for us. Things that I don't even  
5 remember. So, I mean, they have been friends to our  
6 Chapter, and I have worked with them for that many  
7 years. You see other staff members names on letters  
8 because I don't do everything myself personally, but  
9 there has been a relationship between our Chapter's  
10 staff and TV 51 during all the years that are mentioned  
11 here.

12 Q. And can you describe for me the benefits of  
13 that relationship to your organization?

14 A. No. 1, it raises public awareness of our  
15 mission. There's no way to track it, but hopefully  
16 somewhere along the line one of those announcements  
17 concerning things a woman can do to take care of herself  
18 in order to have a healthy baby, I would like to think  
19 that they have made -- they actually made a difference  
20 in the life of one of those babies.

21 And the other -- I just went blank on the  
22 word -- the other positive thing that we get out of it  
23 is, it will encourage people to participate in either  
24 Walk America or Dancing for Dimes which helps us raise  
25 funds for our research and for our programs.

15

1 Q. Great. Thank you very much.

2 A. You're quite welcome.

3 BY MR. BECHTEL:

4 Q. Go about a third of the way through here  
5 and there is a letter from you dated 1, February, '93.  
6 See if you can find that about.

7 A. (Witness reviewed document.)

8 Q. What is a cable ready Walk America spot?

9 A. It's prepared by our National Office and  
10 rolled out to all the Chapters nationally. They are PSA  
11 announcements that could be 10 and 30 second, ready made  
12 for stations to use. And as I said earlier, they would  
13 be tagged with the local telephone number and Chapter to  
14 be reached for more information on that event.

16

15 Q. What's the reference to cable ready?

16 A. It's probably a term that I use, meaning  
17 it's the -- I'm sure you understand the regular videos  
18 that we use in our televisions at home are half-inch,  
19 and I believe cable ready is three-quarter inch.

20 Q. What about broadcast stations?

21 A. I only deal with the local stations so I  
22 don't know what they use, but I would think it would be  
23 three-quarter inch. I am not an expert on this.

24 Q. Neither am I, ma'am.

25 A. So they come -- cable ready to us in the

15

1 office are the ones that come that are about  
2 three-quarter inches wide; that means that they don't  
3 have to take a regular sized video and transfer it over  
4 to the size tape that they use at their stations. It's  
5 ready for them to use.

6 Q. Thank you. That answered my question.

7 Now, go a couple pages over and we had a --  
8 at the bottom it's marked Page 20 and in the middle of  
9 the page it talks about Hallway. And I thought you said  
10 that the station would never have known about this if  
11 you didn't go to them with the tape.

12 A. Um-hum.

13 Q. Was this a pre-produced tape that you got  
14 from the National Office, or did the station produce  
15 this tape?

16 A. National Office.

17 Q. And is it important that the pregnant  
18 mother not yell or argue, too?

19 A. I would certainly think so.

20 Q. I'm sorry?

21 A. I would certainly think so, but this  
22 whole --

23 Q. I wish someone had told my wife.

24 A. But a lot of men don't -- I'm not going to  
25 give you my speech.

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

(Whereupon, the deposition concluded at  
2:15 o'clock p.m.)

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I have read my deposition and it is true and correct except for any corrections listed on the attached Errata Sheet, which I have also signed.

DATE: \_\_\_\_\_

\_\_\_\_\_  
LINDA WITMAN

CERTIFICATE

I, Lori A. Dilks, the officer before whom the deposition of LINDA WITMAN was taken, do hereby certify that LINDA WITMAN, the witness whose testimony appears in the foregoing deposition, was duly sworn by me on October 20, 1999, and that the transcribed deposition of said witness is a true record of the testimony given by her; that the proceedings are herein recorded fully and accurately to the best of my ability; that I am neither attorney nor counsel for, nor related to any of the parties to the action in which this deposition was taken; and, further, that I am not a relative of any attorney or counsel employed by the parties hereto or financially interested in this action.



---

Lori A. Dilks, RPR

Notary Public in and for  
the Commonwealth of Pennsylvania

My commission expires  
September 29, 2003  
BERKS COURT REPORTING SERVICE

BECHTEL & COLE  
FILE COPY

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SEP 28 1999

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

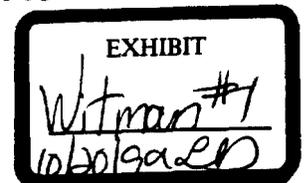
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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

To: Magalie Roman Salas, Secretary  
for direction to  
The Honorable Richard L. Sippel  
Administrative Law Judge

NOTICE BY ADAMS OF DEPOSITION  
UPON ORAL EXAMINATION

Adams Communications Corporation ("Adams") gives notice of its intent to take the deposition of Linda Whitman, Berks County March of Dimes, 519 Reading Avenue, Reading, PA 19611, upon oral examination on Wednesday, October 20, 1999, commencing at 2 p.m. at the Comfort Inn, 2200 Stacy Drive, Reading, PA. We anticipate the deposition will be concluded within one hour. This is one of several depositions being taken during the period Wednesday, October 20, 1999, through Saturday, October 23, 1999. If the date and time cannot be accommodated, please contact Simone Parrish at 202-833-4190 collect, who will make an effort to revise the schedule to accommodate you. The subject of the deposition is your knowledge of programming and operations of station WTVE, channel 51, during the period August 1, 1989



through July 31, 1994. The deposition will be taken before a court reporter.

Respectfully submitted,

Gene A. Bechtel / SP

Gene A. Bechtel  
Harry F. Cole

Bechtel & Cole, Chartered  
Suite 250, 1901 L Street, N.W.  
Washington, D.C. 20036  
Telephone 202-833-4190  
Telecopier 202-833-3084

Counsel for Adams Communications  
Corporation

September 28, 1999