

1 with them through the years.

2 Q. I'm going to ask you about that in just a
3 second.

4 A. Okay.

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

7 A. All my life. I was born and raised in the
8 Reading area. Since 1937, to be exact.

9 Q. And the position that you hold with the
10 organization you described, what are your duties? Tell
11 us a little bit about your work.

12 A. My job is to take care of the day-to-day
13 operations of the Literacy Council of Reading-Berks.
14 I'm Executive Director, as I said, and I supervise 12
15 other people who have various jobs taking care of our
16 non-profit organization.

17 And our mission statement states that we
18 are a non-profit organization who teaches adults to
19 read, write, and in some cases speak English, along with
20 life skills. Actually, we teach our people to read and
21 write through life skill training.

22 Q. And how long have you been with that
23 organization?

24 A. I've been there for ten and a half years.
25 Actually, February, '89 is when I started there.

1 Q. That will help us fix the time period that
2 we're looking for because it's 1989 to 1994, a five-year
3 period --

4 A. Okay.

5 Q. -- starting August 1 of 1989, if you get
6 real precise, to August 1 of '94, so that the
7 commencement of that sort of starts close to your
8 commencement and work with your present organization.

9 During that five-year period did you have a
10 TV set in your house?

11 A. Yes.

12 Q. Did you have one in your office?

13 A. No. We have a TV there but only for tape
14 purposes, VCR purposes. We're not hooked up.

15 Q. Channel 51, during that entire period, was
16 an affiliate of the Home Shopping Network, if that can
17 help you answer this question.

18 A. Right.

19 Q. But, first of all, a more general question.
20 Approximately how much time during that time frame would
21 you spend watching television and what kinds of shows
22 would interest you?

23 A. That's hard to say because in the beginning
24 of that period I didn't really watch a lot of
25 television. It's just been the past few years since I

12

1 have been watching television. And I would watch things
2 like sitcoms, news, particularly the weather, of course,
3 but that was part of the news before we got the weather
4 channel, come to think of it. It would vary just
5 depending on my mood at the time.

13

6 Q. During that five-year period did you watch
7 Channel 51?

8 A. Yes.

9 Q. What did you watch Channel 51 for?

10 A. Well, it was a Home Shopping Club station
11 at that time, and occasionally I would watch it if I was
12 flipping through, I must say. I wouldn't deliberately
13 turn on the television just to watch that particular
14 program. But there were times I would find things
15 interesting, and I'd stay with it for awhile, maybe a
16 half hour at a time or so forth.

17 Q. Now, the reason we've asked you to come and
18 visit with us is we want to learn from you what you know
19 about the program operation of Channel 51 during this
20 five-year period serving the needs and interests of
21 Reading and primarily with regard to the work of your
22 organization.

23 Since the item that you mentioned from your
24 calendar was in 1996, that would be kind of outside the
25 time frame. So if you could just try to go back to the

1 time frame, I would ask you to describe for us the
2 programming of the type I just mentioned that you can
3 recall.

4 A. Okay. As I said, I remember it was Home
5 Shopping Club, but they would also do some spots in
6 between. I don't remember exactly what all the spots
7 were, but I do know that they used non-profit
8 organizations, and they would have various programming.

9 For example, with us they did PSA's for us,
10 and they did like maybe a minute spot or something like
11 that that they would tape later. They would put in
12 their programming from here -- here or there, you know.
13 As far as the rest of the programming is concerned, I
14 can really only remember the Home Shopping Club other
15 than what they did with us.

16 Q. I now am pleased to turn you over to Mr.
17 Hutton who has an exhibit that I think will help get
18 into some of the details.

19 BY MR. HUTTON:

20 Q. First, do you recall who at the station
21 that you dealt with during that time period or who
22 others in your organization might have dealt with?

23 A. I think it was Kimberly Bradley most of the
24 time.

25 Q. Okay.

1 A. There were other people there, too, and I'm
2 not sure if some of those people were volunteers or if
3 they were staff people, like the camera people and so
4 forth.

5 MR. HUTTON: I would like to have this
6 document marked as Breisch Exhibit 3.

7 (Whereupon, the Reporter marked Breisch 3
8 for identification, Issues and Programs Report.)

9 BY MR. HUTTON:

10 Q. Now, this is an exhibit you have not seen
11 before. It is compiled from the records of the station
12 and particularly from the station's quarterly issues and
13 programs reports for the period from the second quarter
14 of 1991 through the second quarter of 1994.

15 A. Okay.

16 Q. And if you will turn to the second page of
17 that document, there is a narrative description at the
18 top about the Berks County Literacy Coalition. I'd like
19 you to review that narrative and tell me if that is
20 consistent or inconsistent with your recollection of
21 what is described there.

22 A. Actually, this is the coalition and not the
23 council. However, I am a member of the coalition -- I
24 should say the Literacy Council is a part of the
25 coalition and -- is there a time on that? '91. That

13

1 was about the time that the Literacy Coalition started.

2 The Literacy Coalition is like an umbrella
3 group for literacy providers, and they also provide a
4 hot line. If someone needs to know where they need to
5 go for a certain area of literacy or someone wants to
6 volunteer to be a volunteer, they can do it through the
7 coalition or directly call the Literacy Council, of
8 course.

9 Q. What other organizations belong to the
10 Literacy Coalition?

11 A. The Reading Area Community College, and
12 then the BCIU, and then there's various companies.
13 There used to be a lot back in 1991, and we're down to a
14 lot less. For example, we have Borders Books now. And
15 interested people, the Reading Eagle and Reading Times,
16 has always been a part of it. At one time there were
17 quite a few people within the media, also, who were
18 represented with the coalition.

19 I was not there during its inception,
20 but -- 'cause that started, I think, in '88 or the
21 beginning of '89, and I just started there -- well, I
22 started there in February of '89. So it was around '88
23 or '89 when that -- when it was conceived.

14

24 Q. And given the demographics of the Reading
25 area, is there any particular reason for organizations

10

1 needing to focus on literacy?

2 A. Oh, very definitely. We definitely believe
3 that if we would have more literate people in our
4 community there would be a lot less need for other
5 non-profits or organizations who need to help people
6 because of their illiteracy problems.

7 Q. To your knowledge, is the literacy rate in
8 this area higher or lower than in other parts of
9 Pennsylvania?

10 A. Well, we serve a lot of people in this
11 community. Of course, we have a lot -- when it comes to
12 percentages I really can't say. I don't know. But
13 we've always estimated about 40,000 people and that
14 comes from the 1990 census, so that's rather outdated.

15 Q. Do you think it's more now?

16 A. Oh, definitely. I will say one thing;
17 we've got a lot larger ESL, or English as a Second
18 Language, population coming into our community over the
19 past five years, especially. We've seen that growth in
20 our own council.

21 Q. Now, with respect to these spots, do you
22 recall these spots airing on WTVE?

23 A. Yes. One other nice thing about that would
24 be I not only would see them but other people would come
25 to me and say, Oh, we saw you on television or we heard

1 your program on television, So the community has seen
2 it. There's no doubt in my mind. That was like an
3 unsolicited testimony of friends, church members,
4 whatever.

5 Q. So you would appear in the public service
6 announcements yourself?

7 A. Oh, yeah, many times.

8 Q. And I take it that the ones in which you
9 appeared are different from the one that is described in
10 the second page of this document. Is that correct?

11 A. Well, actually they're pretty much the same
12 except here it says it urged calls to the Berks County
13 Literacy Coalition to see how you can help erase
14 illiteracy. Our spiel, if you will, was pretty much the
15 same as this one. You know, we would mostly ask for
16 volunteers. And then instead of calling the coalition
17 we would invite them to call the Literacy Council
18 itself.

19 We're one of the two larger literacy
20 providers in the community, the other being the Reading
21 Area Community College. Our expertise, if you will, is
22 one-on-one tutoring; that's why it's always difficult
23 for us to find enough volunteers to do what we need.

24 Q. If you can recall, approximately how many
25 public service announcements did WTVE produce for your

1 organization during the 1989 to '94 time period?

2 A. I couldn't give you a definite number. I
3 couldn't even give you an estimate. But I would say we
4 might not have been on every year but at least every
5 other year because I know one time I was invited to the
6 station to do like a 30-minute question and answer type
7 thing, and I can't tell exactly when that was but I'm
8 pretty sure it was during that time period. It was such
9 a long time ago. It had to be during that time period.

10 Q. Did you appear in that program?

11 A. Yes, I did. I was alone in that one. One
12 of the people who worked there at the station -- if I'm
13 not mistaken -- and I shouldn't be guessing, I know --
14 but I do believe the lady who did the interview with me
15 was a person who was doing a study or something like
16 that. She was studying to be a radio announcer at the
17 time.

18 Q. Did you later see that program aired on the
19 station?

20 A. Yes. Yes, I did. I don't usually like to
21 watch myself but I did.

22 Q. I hope you got positive feedback from the
23 community on that one.

24 A. Yes, I did. I'm always concerned I'm going
25 to stumble over my words, like I'm doing right here, and

14

1 make a fool of myself.

2 Q. I'd like to flip back now to the report for
3 the fourth quarter of 1991, which is several pages back.

4 A. The fourth quarter. Okay. I have it.

5 Q. It refers to two spots for the Literacy
6 Coalition, one being the one that was described
7 previously and the other one being a new one. I'd like
8 you to review those narratives and tell me if you can
9 recall the second PSA that's described there.

10 A. (Witness reviewed document.)

15

11 Okay. The No. 2, particularly. I'm not
12 sure about the No. 1. That may have been a coalition,
13 but I'm more apt to think it was a Literacy Council.

14 The second one, it looks very much to me as
15 though that was a Literacy Council promotion because we
16 showed prints from various countries and we explained
17 how -- to someone who can't read how things look in a
18 foreign -- like a foreign language. And here it says,
19 Urges people to call their local chapter; that's why I'm
20 more inclined to think that was the Literacy Council.

21 Q. Based on these narratives, it sounds to you
22 like these descriptions are actually for your
23 organization even though the narrative describes it as
24 the Literacy Coalition?

25 A. That's correct. As I said before, that

14

1 happens all the time.

2 Q. And just reviewing the other spots
3 described on the page, do you recall seeing any spots of
4 that nature on the station when you happened to see it?

5 A. Well, yeah, the Pets of the Week.

6 Q. What was that?

7 A. Did I see it on TV, is that what you're
8 saying?

9 Q. Yes.

10 A. Yes. This is the one where they show an
11 animal that comes from the Humane Society -- it is the
12 Humane Society. I didn't realize that they bring four
13 animals over at a time. But I would watch it
14 occasionally because oft times we might be looking for a
15 pet, oft times -- because we've been up to four cats in
16 my family. We're kind of getting away from that right
17 now. And now I try not to watch those things because it
18 makes me feel bad because I can't take them along home.

19 (Witness reviewed document.)

20 Q. Turning to the first quarter of 1992, it
21 appears that the same two PSA's were aired during that
22 time frame as well.

23 A. Right.

24 Q. Is that consistent with your recollection?

25 A. Yes. Oh, and I see they have the times

1 here. Yes, they do them quite often -- or they did them
2 quite often at that time.

3 Q. Were there other broadcast stations in
4 Reading that provided a similar service to your
5 organization?

6 A. Yes. BCTV, they definitely were operating
7 during that time. And when we started our biggest fund
8 raiser, which is Buck a Book, that's when we got a lot
9 more coverage from both stations. And we've been doing
10 that -- I think we started about 1994 to do those, to do
11 Buck a Book. It's about five years old now. And we
12 really clamored with not only the TV stations, but also
13 for the radio stations to do PSA's for us during the
14 period between Christmas and New Year's throughout the
15 entire month of January because Buck a Book is
16 traditionally the second to the last week in January.

17 Q. So the first one, you think, would have
18 been January of '94 or January of '95?

19 A. Probably January, '94.

20 Q. Well, we'll see if it's in our compilation
21 here. Turning now to the second quarter of 1992, again,
22 the same two spots are described and in the following
23 pages there's a tabulation of when they were aired by
24 WTVE. Is all that consistent with your recollection?

25 A. Yes.

1 Q. Now, for the third quarter of 1992, I think
2 it's just a tabulation of when the station aired the
3 spots. Is that consistent with your recollection?

4 A. Yes.

5 Q. For the fourth quarter of 1992 there's a
6 narrative description that appears to follow the prior
7 narrative, and then there are tabulations of when the
8 spots ran, and I would like to ask you if that's
9 consistent with your recollection.

10 A. Yes.

11 Q. And for the first quarter of 1993 the same
12 is true, and I would like to ask you again if that is
13 consistent with your recollection.

14 A. As soon as I get there. The first quarter
15 of '93, did you say?

16 Q. Yes.

17 A. (Witness reviewed document.)

18 Yes.

19 Q. Now, for the second quarter of 1993, there
20 again appears to be a narrative followed by a tabulation
21 of the times that the spots aired on the station. I
22 would like to ask you if that is consistent with your
23 recollection.

24 A. Yes.

25 Q. Likewise, for the third quarter of 1993.

15

1 There is a narrative description followed by a
2 tabulation of the times that the spots aired on the
3 station, and I would like to ask you if that is
4 consistent with your recollection.

5 A. (Witness reviewed document.)

6 Yes.

7 Q. Now, I think we're up to the fourth quarter
8 of 1993.

9 A. Okay. All right.

16

10 Q. And here I think there's just a narrative
11 description. I'd like to ask if that's consistent with
12 your recollection.

13 A. Yes.

14 Q. And for the first quarter of 1994 there,
15 again, appears to be a narrative of the two spots and a
16 tabulation for at least one of the spots. I'd like to
17 ask if that's consistent with your recollection.

18 A. Yes.

19 Q. I have to note that there may be some gaps,
20 and we may be missing a page or two from these records.

21 And, finally, we have the second quarter of
22 1994. Again, there appears to be a tabulation of when
23 one of the spots ran. I'd like to ask if that's
24 consistent with your recollection.

25 A. Yes. These were like run all the time, you

18

16

1 know, unusual times even, and that's when people seemed
2 to be watching television.

3 MR. HUTTON: I don't have anything further.

4 MR. BECHTEL: Thank you very much for your
5 time.

6 (Whereupon, the deposition concluded at
7 2:20 o'clock p.m.)

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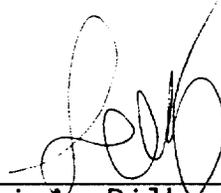
I have read my deposition and it is true and correct except for any corrections listed on the attached Errata Sheet, which I have also signed.

DATE: _____

JOAN BREISCH

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25CERTIFICATE

I, Lori A. Dilks, the officer before whom the deposition of JOAN BREISCH was taken, do hereby certify that JOAN BREISCH, the witness whose testimony appears in the foregoing deposition, was duly sworn by me on October 22, 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

BERKS COURT REPORTING SERVICE

READING EXHIBIT 38
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BECHTEL & COLE
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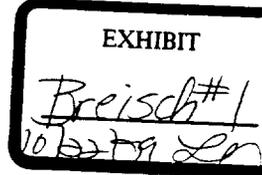
RECEIVED

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

SEP 28 1999

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 Joan Breisch, Executive Director, Berks County Literacy Coalition, 519 Elm Street, Reading, PA 19603, upon oral examination on Friday, October 22, 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 12P

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

CERTIFICATE OF SERVICE

I certify that I have this 28th day of September 1999 caused copies of the foregoing NOTICE BY ADAMS OF DEPOSITION UPON ORAL EXAMINATION to be hand delivered to the offices of the following:

The Hon. Richard L. Sippel
Administrative Law Judge
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

James Shook, Esq.
Mass Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Thomas J. Hutton, Esq.
Holland & Knight, L.L.P.
Suite 200, 2000 K Street, N.W.
Washington, D.C. 20006
Counsel for Reading Broadcasting, Inc.



Simone Parrish
Legal Assistant

SUBPOENA

ORIGINAL - To be executed by the person who effects service and returned to the Secretary of the Commission.

UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION

EXHIBIT
Breisch # 2
10/22/99

IN THE MATTER OF
READING BROADCASTING, INC.
For Renewal of License for
Station WTVE (TV), Channel 51,
Reading, Pennsylvania

MM Docket No. 99-153

THE PRESIDENT OF THE UNITED STATES OF AMERICA

To Joan Breisch, Executive Director, Berks County Literacy Coalition, 519 Elm Street, Reading, PA 19603 GREETINGS:

YOU ARE HEREBY ORDERED under penalty of law to appear before the Federal Communications Commission or any duly authorized notary public at the Comfort Inn, 2200 Stacy Drive (Name and official title of person authorized to take depositions)

in the city of Reading, PA on the 22nd day of October, 19 99, at 2 o'clock P.M., of that day, to testify in the above-captioned matter and to bring with you and to produce then and there the following books, papers, and documents: See attached

READING EXHIBIT 38
PAGE 25

BY ORDER OF THE FEDERAL COMMUNICATIONS COMMISSION, this twenty-eighth day of September, 19 99

Richard L. Huppel
(Official Title)
Administrative Law Judge

NOTICE: - Witness fees and mileage for attendance under this subpoena for service hereof are to be paid by the party at whose instance the witness is subpoenaed, and every copy of this summons for the witness must contain a copy of this notice.

Service of subpoenas may be made by any citizen of the United States over the age of 18 years who is competent to be a witness, and is not a party to or in any way interested in the proceeding.

PROOF OF SERVICE ON REVERSE SIDE.

Attachment 1:

DOCUMENTS TO BE PRODUCED

All documents of any kind or description relating to the deponent's knowledge of or familiarity with the operations, including the programming, of Station WTVE(TV), Reading, Pennsylvania, during the period August 1, 1989 through July 31, 1994.

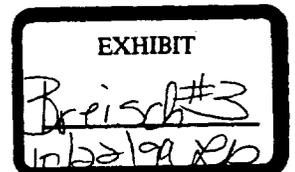
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ISSUES AND PROGRAMS REPORT
SECOND QUARTER
1991

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

COMPILED BY:
GEORGE MATTMILLER
JULY, 1991

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BERKS COUNTY LITERACY COALITION

Aired :30 P.S.A. produced by TV 51 (in a previous quarter) which focused on the rewards of teaching someone else to read like everyone else. It urged calls to the BERKS COUNTY LITERACY COALITION to see how you can help erase illiteracy.

HOLOCAUST MEMORIAL FUND

Aired :30 P.S.A. to help raise funds for a Holocaust memorial being put together by families whose members were involved.

KEYSTONE SAFETY BELT NETWORK

The KEYSTONE SAFETY BELT NETWORK had a :30 produced by TV-51 (in a previous quarter) which aired on the station and featured the benefits of wearing seat belts.

READING LIONS AND LIONESS CLUB OF LIONS DISTRICT 14F

Aired :30 P.S.A. promoting the Lions International Quest Program, which is involved in education for drug and alcohol prevention. This work is done by volunteers in the church, schools, and the home.

MID-ATLANTIC AIR MUSEUM

This :30 P.S.A. promotes the aeronautical exhibits at the MID-ATLANTIC AIR MUSEUM, including the B-25 Mitchell Bomber.

ISSUES AND PROGRAMS REPORT
THIRD QUARTER
1991

WTVE-TV 51
1700 NORTH ELEVENTH STREET
READING, PENNSYLVANIA 19604

COMPILED BY:
GEORGE MATTMILLER
OCTOBER, 1991

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