

Radio:

Its Role in Serving the Public Interest

By

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Page

AS  
36  
.N6  
P45  
1979  
no. 3  
c. 2

## Outline

- I. Serving public interest required for licensing
  - A. Powers of FCC
  - B. Proposed changes in Communications Act
- II. Setting minimum standards of public service
  - A. FCC study
  - B. Committee recommendations
  - C. Blue Book
  - D. Free hearing
  - E. Former FCC member
- III. 1971 primer
  - A. Ascertaining problems
  - B. Programs and documentation
- IV. 1976 primer
  - A. Annual Problems-Programs List
  - B. Initiating programming
- V. Personal experience
  - A. Profile of WLNC
  - B. Public interest programming

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## Introduction

Radio provides a method of communication between widely separated points using a transmitter, electromagnetic waves which carry the sound, and a receiver. The United States government created an independent agency, the Federal Communications Commission (FCC), in 1934 to regulate radio and other forms of transmissible communications. The Commission's purpose, as outlined in the Communications Act of 1934, is:

"...to make available, so far as possible, to all people of the United States a rapid, efficient, nation-wide, and world-wide wire and radio communication service with adequate facilities at reasonable charges."<sup>1</sup>

Anyone broadcasting within the United States or any of its territories or possessions must be licensed by the FCC. Through its requirements for obtaining a license, the Commission influences what information or other programming is broadcast. Although the FCC has no power of censorship, it has made strong efforts to see that broadcasters serve the public interest. Since limits exist on the number of radio frequencies, geographic locations of stations, and possible transmitter power, some regulation of broadcasting is necessary. And the First Amendment court decisions have supported the FCC's power to treat the airwaves differently from the print media by spelling out the need to serve the interests of the listening audience.

The Federal Communications Commission, by law, grants licenses and license renewals to radio stations only if the licensee will serve the public interest. According to the Commission:

"Such service necessarily includes broadcasting of a considerable proportion of programs devoted to education, religion, labor, agriculture and similar activities concerned with human betterment."<sup>2</sup>

Every three years when standard broadcast (AM) stations must undergo the license renewal process, each station is required by the FCC to present proof that programming during the license period has served the public interest and that future programming will do so also. While the FCC does not have the authority to designate specific programming for any station, it may fine or refuse to renew the license of any station found lacking in programming that serves the public interest. Fines are much more common than license revocation. Of the five stations that have experienced license revocation, three cases concerned failing to serve the public interest according to Ernst.

"Only five stations in all broadcasting history have had their licenses revoked for improper program schedules- two for fraudulent broadcastings about fake medical cures and irregular stocks, two for false statements regarding ownership, and one for libelous and prejudicial broadcasts against public officials and religious groups."<sup>3</sup>

Most fines assessed against radio stations relate to technical rather than programming aspects of station operations. Correspondence from a Washington, D.C., law office to a local radio station indicated the few fines for improper programming usually fall in the areas of false advertising and wrongly conducting contests. Failure to meet public interest broadcasting recommendations will more often result in a delay in license renewal until corrective actions or promises of such actions are made.

The powers and responsibilities of the FCC are defined in the Communications Act of 1934. Congress is currently considering legislation, House Bill 3333, that would change many provisions of this act. The Communications Act of 1979, as it will be called if it becomes law, will:

"...establish certain requirements relating to the regulation of interstate and foreign telecommunications to the extent that marketplace forces fail to protect the public interest."<sup>4</sup>

For radio this means immediate deregulation which would eliminate the Fairness Doctrine and equal time regulation. Thus a station could present only one side of an issue or refuse air time to any political candidate. The new act also:

"Provides for indefinite licenses which are subject to revocation only for violation of technical standards.

Eliminates current ascertainment rules."<sup>5</sup>

Serving the public interest would not be the primary focus of a station unless it so desired. Stations could forget about current rules requiring them to determine and meet the most significant community needs. The bill, introduced in the House March 29, 1979, has as one of its sponsors Representative James T. Broyhill of North Carolina's tenth district.

The Senate nearly passed the Wagner-Hatfield Amendment when the 1934 Act was under consideration by Congress. That amendment would have required all radio stations to allocate a full 25 percent of their air time to educational, agricultural, religious, and other non-profit-making interests. Currently each station decides how much time to allow for these interests. Instead of that amendment, a proposal passed Congress directing the FCC to make a study of the idea proposed in the amendment. The Commission felt it already had sufficient authority to achieve what Congress intended, and so recommended against the legislation:

"The Commission feels that present legislation has the flexibility essential to attain the desired ends without necessitating at this time any changes in the law.

In order for non-profit organizations to obtain the maximum service possible, cooperation in good faith by the broadcasters is required. Such cooperation should therefore be under the direction of the Commission."<sup>6</sup>

The FCC has no power of censorship. But the Commission does take into account if programming broadcast by a station is in the public interest when reviewing an application for license renewal. The Commission states the basis for ranking the public interest as the top priority as follows:

"While it is to be expected that a licensee of a radio broadcasting station will receive some remuneration for serving the public with radio programs, at the same time the interest of the listening public is paramount, and may not be subordinated to the interests of the station licensee. A license to operate a radio broadcasting station is a franchise from the public, and the licensee is a trustee for the public."<sup>7</sup>

The Commission used this statement to explain its refusal to renew one station's license because it insufficiently served the public interest. Other such cases have established that the Commission may consider past programming performance when considering a license renewal application.

The FCC had existed only a few years when a committee of the Commission considered establishing minimum standards for programming serving the public interest. The committee recommended that any minimum standards would serve only as guidelines for stations:

"It is very difficult to prescribe 'standards of public service' uniformly for all broadcasting stations because initiative and reasonable freedom of action are essential to the American system of broadcasting.

The problem is also complicated by the fact that the requirements of broadcast service differ in the various sections of the nation, and within these sections each community presents its individual dissimilarities. Also, the economic factor is different for each class operating in different communities. While it is the primary duty of each station licensee to offer programs which will fully satisfy the public needs in the particular area served, it is obvious that some general principles might apply to the industry as a whole....However, it is needless to state that such standards should be a minimum and they should be utilized solely as guides and subject to variation in accordance with changed conditions and even then should not be requirements of the Commission."<sup>8</sup>

The recommendation by the committee that the minimum standards serve only as guidelines resulted in criticism from some congressmen that the Commission required too little of stations in regard to operation in the public interest.

Positive action on public interest requirements by the FCC came in the 1940's when it hired Dr. Charles Siepmann to study the problem. The former British Broadcasting Corporation executive presented his findings which were adopted by the Commission and published in March, 1946. The report, "Public Service Responsibility of Broadcast Licensees," is known popularly as the Blue Book. The report said that program service should be determined by each licensee, but that the Commission still had the responsibility of seeing to it that these duties are carried out. The report outlined four factors for determining whether or not a station operated in the public interest:

"(1) The carrying of sustaining programs to provide a "balanced" program structure; (2) the carrying of local live talent programs; (3) the carrying of programs dealing with important public issues, and (4) elimination of advertising excesses."<sup>9</sup>



In addition, the Commission listed five functions required in the sustaining program:

"1. To secure for the station or network a means by which in the overall structure of its program service it can achieve a balanced interpretation of public needs.

2. To provide programs which by their very nature may not be sponsored with propriety, such as some programs sponsored by religious, educational, governmental, or welfare groups.

3. To serve significant minority tastes and interests, such as providing programs of classical music or those of a literary nature.

4. To serve the needs and purposes of non-profit organizations such as educational institutions.

5. To provide a field for experiment in new types of programs, free of restrictions that obtain with reference to programs in which the advertiser's interest in selling goods predominates."<sup>10</sup>

The Commission left it to each station to determine what percentages of air time would be required for covering the program categories. The key words related to time are "'balanced' program structure."

These guidelines provided no drastic change from previous FCC policy. But they did codify program factors that had been used for 20 years in deciding particular cases.

Balanced programming, in Robinson's view, means freedom of hearing. Each individual decides what he will listen to on the radio, if anything at all:

"Free hearing....implies that what the individual wants to hear is on the air. This is essentially a question of program variety. In the political domain it takes the form that all sides of a controversial issue should be presented and be available to the listener."<sup>11</sup>



He continued that to achieve free hearing, this principle should apply to all types of programming; everything a listener wants to hear should be available.

According to Nicholas Johnson, a former member of the Federal Communications Commission, the courts and the FCC want public interest requirements in order to prevent radio stations from using each hour to make the maximum amount of profit possible:

"Stations must offer news and public affairs programming that's not slanted to support their own, and advertisers' economic and political interests- without sponsors, if necessary. They have to put on all candidates for political office, even ones they dislike. They must air positions on controversial issues with which they strongly disagree.

These obligations and many others exist because the law treats the station more as a community resource than as a private preserve. They are a trade-off for the broadcaster's opportunity to make very substantial private profit from public property during a limited three-year license."<sup>12</sup>

Johnson opposes the 1979 changes in the Communications Act. He cited six stories he says could possibly become "real-life nightmares" if the legislation passes Congress, one of which was:

"In one state over 90 percent of the radio stations have recently announced policies forbidding the airing of any public service announcements. The American Cancer Society, the local Jaycees and dozens of other national and local groups have nowhere to turn. The stations explained the move was necessitated by recent increases in operating costs."<sup>13</sup>

Current law helps service organizations and other groups by requiring each station to make a minimum number of public service announcements. The amount

of time devoted to this requirement is decided by the individual stations. Failure to do so is punishable by fines or other measures by the FCC.

In applying for license renewal, radio stations must show they have ascertained community problems and broadcast matter dealing with those problems. The Commission adopted a primer February 18, 1971, to provide guidelines in this area. The primer explained the general purpose of this requirement:

"To show what the applicant has done to ascertain the problems, needs and interests of the residents of his community of license and other areas he undertakes to serve, and what broadcast matter he proposes to meet those problems, needs and interests, as evaluated."<sup>14</sup>

Consultations with members of the general public and leaders of significant groups in the station's service area provided the list of problems, needs and interests. The community groups include formal organizations, informal groups, and racial and ethnic groups. These consultations are for the sole purpose of compiling a list of problems, not securing ideas for particular programming by the station:

"...a leader in the educational field would be a useful source of information on educational matters; a labor leader, on labor matters; and a business leader on business matters. However, it is also recognized that individual leaders may have significant comments outside their respective fields, and the applicant should consider their comments with respect to all community problems."<sup>15</sup>

The responsibility of initiating programming to meet these problems lies with the applicant only.

Some stations have found over the years that while consulting with community leaders, little information surfaced concerning community problems.

The FCC Primer said the applicant cannot assume few problems exist. A lack of response requires a re-examination of the consultation efforts to determine if they were designed correctly so as to obtain enough information.

The primer also instructs the applicant to evaluate all information received through consultations, determining the importance of community problems and deciding which problems may be met with broadcast programs. The applicant is not required to try to meet each ascertained problem:

"...he is expected to determine in good faith which of such problems merit treatment by the station. In determining what kind of broadcast matter should be presented to meet those problems, the applicant may consider his program format and the composition of his audience, but bearing in mind that many problems affect and are pertinent to diverse groups of people."<sup>16</sup>

The applicant decides how many of the problems to meet with programming and to what extent.

The FCC requires extensive documentation proving a station's efforts in meeting community problems with broadcast programming. Applications require a complete description of each program, or program series, its length, when it is run and how often:

"Applicants should note that they are expected to make a positive, diligent and continuing effort to meet community problems. Therefore, they are expected to modify their broadcast matter if warranted in light of changed community problems. If announcements are proposed, they should be identified with the community problem or problems they are designed to meet."<sup>17</sup>

Simply making announcements instead of developing specific programming would not suffice for meeting community needs in most cases. The primer said the

station would have to prove that announcements were the most effective way of meeting community problems. Further inquiry by the FCC would result were this not shown. Neither can a station rely on news programs to meet community problems. The FCC said news is factual reports not designed specifically to meet community needs.

The Commission adopted the second part of the Ascertainment Primer in February, 1976. This even more clearly defined how stations were to meet community problems by requiring an annual Problems-Programs List beginning August 1, 1976. A memorandum from the legal department of the National Association of Broadcasters (NAB) said the preparation of these lists is the most common error in license renewal applications:

"Each licensee must place in the public file a list of not more than 10 significant problems and needs which existed in its service area during the preceeding 12 months, and a related list of typical and illustrative programming presented during that period to treat those problems and needs."<sup>18</sup>

The public file referred to here contains all information pertinent to each station's operations including programming, ownership, technical data, and letters of criticism or praise from the public. This file is available for public inspection during regular station business hours.

Stations are not required to list 10 problems, only those problems they attempted to treat through programming. The Commission still seeks programming, not just announcements or news inserts, to meet community problems:

"Editorials, special news programs and public affairs programs should be listed. Since the Commission has not defined the length a broadcast unit must achieve to be counted as a "program," it is left to the licensee's discretion. NAB believes any identifiable program unit over 60 seconds

in length should suffice, but again, it is the licensee which must decide."<sup>19</sup>  
A station may decide to attempt meeting community needs with only one type of program. Network programs apply also, but a station is not to rely solely on network programs in meeting this requirement.

Some community problems will no doubt be too minor to require media coverage, such as an occasional lost dog. A large number of community problems also would prevent a station from initiating programming to meet all these needs, so choices must be made:

"The licensee is left with deciding which problems should be treated. In deciding this, the licensee may consider the programming offered by other stations in the area as well as its own format and the composition of its audience. However, since many problems are pertinent to diverse groups in the community and since the station should provide some service to each group, the licensee should not routinely exclude certain groups from its nonentertainment programming."<sup>20</sup>

Decisions as to which problems will be treated may be made by the general manager, news director, other staff members or any combination of these station employees. This researcher, while investigating the role of radio in serving the public interest, has been employed on a part-time basis as news director of standard broadcast station WLNC in Laurinburg, North Carolina. The following information comes from personal experience in serving the public interest.

WLNC has long been noted for its service to the community as evidenced by many public service awards. WLNC operates with a power output of 500 watts at 1300 kilohertz. The station primarily serves Scotland County but has a broadcast radius of 30 to 40 miles. The population in Scotland County numbers approximately 29,000.

The ability of WLNC to serve the public interest improved when it

affiliated with the National Broadcasting Company (NBC) Radio Network on January 15, 1979. In addition to regular hourly newscasts at or just before the top of the hour, NBC offers serious and satirical commentary, financial news, human interest programs, sportscasts and special programs at various times every day of the week.

WLNC also presents local and/or state news every hour prior to NBC news. Three four-minute local newscasts are sponsored by area merchants on weekdays. Most of the local news is gathered and written by the news director. State news comes via an Associated Press (AP) radio news wire. The typed copy that the wire provides also supplied the national and international news prior to affiliation with NBC.

Keeping the public informed about current events, many of which are not worthy a story in a newscast, is an important goal at WLNC. Public service announcements (PSA's) are scheduled at 10 minutes after and 20 minutes before the top of each hour. A PSA ranges in length from 10 seconds to one minute—about 20 to 120 words. Announcements about almost any activity or service make up the 10 to 20 PSA's used each day. Typical PSA's include recreation class registration, fund raisers, safety suggestions, times and locations of meetings, and general reminders.

Following each PSA, the air personality gives the weather forecast. The official forecast from the National Weather Service Office in Raleigh comes to WLNC by way of the AP wire. This area of the state is zone 4, the southern coastal area and sandhills. The forecast includes sky conditions, expected high and low temperatures, and probabilities of precipitation. A thermometer at the station provides the local temperature.

Air personalities have no restrictions placed on them about giving PSA's, news headlines, or other announcements at any other time of the hour. Some



events prompt extra on-the-air attention, such as a visit by the Red Cross Bloodmobile or a special fund-raising event.

WLNC also provides on-the-scene coverage of various events through a two-way radio and a portable transmitter that broadcast to the station on licensed frequencies. These remote broadcasts are then mixed through the control room board and may be heard by the public on their AM radios. Live coverage nearly always increases awareness of and response to an event. The Scottish Shrine Club asks WLNC to broadcast from each of their semi-annual fish fry dinners. One dinner within the last two years had no live coverage, and the attendance was well below average.

Fulfilling the annual ascertainment of community problems, needs, and interests involved telephone and face-to-face interviews to compile the required Problems-Programs List. The 10 most significant problems in the WLNC listening area for the year beginning August 1, 1978, and ending July 31, 1979, were identified as follows: 1. recreation, 2. streets and highways, 3. employment, 4. medical problems, 5. cost of living, 6. crime/law and order, 7. discrimination of minorities, 8. community planning, 9. race relations, and 10. education.

Currently three features in the WLNC programming seek to meet these community needs and a fourth method is in the planning stages. Special Reports, editorials, and a public service feature called the Talkline address the problem areas now. A telephone line is being installed that will allow listeners to call in and record a message concerning any problem they wish to comment on. Plans call for editing the comments if necessary and broadcasting them at specified times of the day.

Daily editorials by the general manager and at least one guest editorial each week have touched on all the community problems listed for the current broadcast year. The last Special Report, presented in January, concerned a



controversial and confusing education issue. The Scotland County Board of Education had considered redrawing school district lines for many years. The board presented three final redistricting options to the public in January. Each option was investigated in a separate four-minute interview on each of the three weekdays preceding a public hearing on the options. Scotland County Schools Superintendent Dr. Johnny Presson and Associate Superintendent Joe Odom provided the redistricting information in the interviews. Another series called the Special Olympics Odyssey is planned, focusing on the North Carolina Special Olympics for the mentally retarded, to be held in Laurinburg June 1, 2 and 3, 1979.

The Talkline is a public affairs feature at WLNC designed specifically to meet many community problems. A Talkline is a recording of a member of an organization or agency telling about an event planned or a service offered. The group member gives the pertinent information about his event or service, usually in approximately 30 seconds to one minute. These voice tracks are recorded over one distinctive music bed and aired at specified times, nearly every hour of the week. All Talklines conclude with the standard ending: "This is (name) with (organization). We're proud that WLNC cares." At the end of March, all but one of the community problems for this broadcast year had been addressed by at least one Talkline. The following examples are actual Talklines used on the air at WLNC to meet community problems.

Recreation, identified as the most significant problem in the WLNC listening area, is handled most often through the activities of the Scotland County Parks and Recreation Commission. However, this 70-second Talkline concerns a basketball skills contest sponsored by a local civic club in March, 1979:

"The Laurinburg Optimist Club is pleased to sponsor again this year

the Tri-Star Basketball Skills Contest. It will be held in the Laurinburg Junior High gym on March 10 and March 17. For boys and girls ages 8, 9, and 10, the contest will be on March 10. For boys and girls ages 11, 12, and 13, the contest will be on March 17. There will be 18 trophies awarded, three trophies for each age group. Every participant will receive a Tri-Star basketball patch. Also, the schools will be given a basketball after the completion of the competition. You do not have to bring an application to the contest; you just need to come to the Junior High gym on the date that your age group will be competing. If you need more information, please see the physical education teacher in your school. This is John Massey with the Laurinburg Optimist Club. We're proud that WLNC cares."<sup>21</sup>

The second problem area, streets and highways, includes a number of topics that WLNC presents. Safety messages from the State Highway Patrol apply here, like this 30-second Talkline used during the Christmas and New Year's holidays in 1978:

"Motorists in North Carolina face stiff odds when it comes to the possibility of having a traffic accident. The State Highway Patrol reminds you that last year on the average a traffic accident occurred every four minutes, 240 persons were injured every day, and someone was killed every six hours. Please drive safely this holiday season. This is Sergeant Robert Walsh with the State Highway Patrol. We're proud that WLNC cares."<sup>22</sup>

Employment ranked third among the significant problems in the WLNC listening area. An employee of the Laurinburg office of the Employment Security Commission of North Carolina lists three or four local job openings in a Talkline updated each week:

"Matching people and jobs is the primary objective of the Job Service Office located at 130 Biggs Street in Laurinburg. The following jobs are

a sample of our current openings for qualified applicants; tractor trailer truck driver, cabinet maker, millwright, and an iron worker in structural steel. Remember Job Service when you have a job to fill. This is Malcolm Hobbs of your local Job Service Office. We're proud that WLNC cares."<sup>23</sup>

Nearly all of the Talklines dealing with medical problems, fourth on the list, come from the Scotland County Health Department. Information is provided by the health educator or from the person in charge of a particular program. This 40 second Talkline on a special clinic began March 1, 1979:

"A reminder that the Scotland County Health Department continues to offer special education sessions on high blood pressure every Wednesday afternoon from 2:30 to 3:30. At this time you may have your blood pressure checked, look at a 10-minute film explaining high blood pressure and proper care, and talk with a nutritionist about proper diet. A family nurse practitioner and health educator are also available at this time. All residents of Scotland County can get their blood pressure checked at the Health Department every day of the week between 8:30 to 12 and 1 to 4:30, free. This is Reg Simpson of the Scotland County Health Department. We're proud that WLNC cares."<sup>24</sup>

The fifth community problem, cost of living, has proved harder to meet than most other problems through Talklines. One Talkline, aired the last two weeks of 1978, concerned the change in the food stamp program that began at the first of the year:

"Are you one of the people in Scotland County who has been participating in the food stamp program? Have you had trouble coming up with the money for the monthly purchase price of the stamps? If so, you won't have to worry after the first of January. The new, no-cost food stamp program begins then. Your eligibility worker at the Scotland County Department

of Social Services will explain all the details. This is Evalyn Newton with the Social Services. We're proud that WLNC cares."<sup>25</sup>

More than 50 different Talklines were used by WLNC during the first three months of 1979. Many Talklines are not solicited. People call and write the station asking if they can make a Talkline about some project in which they are involved. The Talkline is clearly the most popular and effective public affairs program at WLNC.

### Conclusion

Broadcasting is a profession that many people know little about. But the public knows what it expects from a radio station. In my nearly three years in radio, I have learned that people want a station that communicates with them, providing not only musical entertainment but also giving information concerning important issues and events in the community. Even happenings of no great significance to the entire community are still important to certain portions of the listening audience and must be treated to some extent by the station. Failure to adequately serve the public interest can result in a loss of community respect in addition to action by the FCC. Fortunately, most radio station licensees recognize and strive to fulfill their obligation to service the problems, needs, and interests of the public.

Footnotes

- <sup>1</sup>"Radio;" American Peoples Encyclopedia, 1959, VIII. 425.
- <sup>2</sup>"Public Service Responsibility of Broadcast Licensees," Federal Communications Commission, 7 March 1946.
- <sup>3</sup>Morris L. Ernst, The First Freedom, (New York: The Macmillan Co., 1946). p. 160.
- <sup>4</sup>James T. Broyhill, "A Summary of the Communications Act of 1979," letter 2 April 1979, p. 1.
- <sup>5</sup>ibid. p. 6.
- <sup>6</sup>"Report to Congress Pursuant to Section 307(C) of the Communications Act of 1934," Federal Communications Commission, 22 Jan. 1935.
- <sup>7</sup>Walter B. Emery, Broadcasting and Government, (Ann Arbor: Michigan State Univ. Press, 1971), p. 390.
- <sup>8</sup>"Committee Report on Proposed Rules Governing Standard Broadcast Stations and Standards of Good Engineering Practice," Federal Communications Commission, 1 April 1939.
- <sup>9</sup>op. cit. p. 6.
- <sup>10</sup>ibid., p. 7.
- <sup>11</sup>Thomas Porter Robinson, Radio Networks and the Federal Government, (New York: Columbia Univ. Press, 1943), p. 85.
- <sup>12</sup>Nicholas Johnson, "The Public Interest Falls by the Wayside," The Fayetteville Observer-Times, 6 Aug. 1978.
- <sup>13</sup>ibid.
- <sup>14</sup>op. cit., p. 531.
- <sup>15</sup>ibid., pp. 534-535.
- <sup>16</sup>ibid., p. 536.
- <sup>17</sup>ibid., p. 537.
- <sup>18</sup>"Counsel from the Legal Department," National Association of Broadcasters, letter Nov. 1978, p. 1.
- <sup>19</sup>ibid., p. 2.
- <sup>20</sup>ibid., p. 3.
- <sup>21</sup>"Special Programming File," WLNC, 1979.

22 *ibid.*

23 *ibid.*

24 *ibid.*

25 *ibid.*



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