

31550

127269

---

BY THE U.S. GENERAL ACCOUNTING OFFICE

**Report To The Honorable Claiborne Pell  
United States Senate**

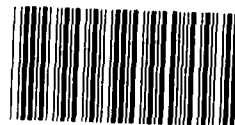
---

**Improved Oversight Can Reduce Broadcast  
Violations At Radio Free Europe/Radio Liberty**

Radio Free Europe and Radio Liberty have existed since the 1950s as private, government-financed radio services broadcasting to Eastern Europe and the Soviet Union, respectively. The radios operate under American management and the statutory oversight of the Board for International Broadcasting.

GAO found that management's ability to prevent violations of program guidelines has been weakened, and there are indications that the Board's independent oversight has decreased.

GAO is making a series of recommendations to the Board to improve management's broadcast controls and strengthen the federal oversight. While disagreeing with some of GAO's observations, the Board indicated that the recommendations concerning broadcast controls are being implemented and those concerning federal oversight have been or will be fully addressed.



127269

GAO/NSIAD-85-93  
JUNE 24, 1985

032402

**Request for copies of GAO reports should be sent to:**

**U.S. General Accounting Office  
Document Handling and Information  
Services Facility  
P.O. Box 6015  
Gaithersburg, Md. 20877**

**Telephone (202) 275-6241**

**The first five copies of individual reports are free of charge. Additional copies of bound audit reports are \$3.25 each. Additional copies of unbound report (i.e., letter reports) and most other publications are \$1.00 each. There will be a 25% discount on all orders for 100 or more copies mailed to a single address. Sales orders must be prepaid on a cash, check, or money order basis. Check should be made out to the "Superintendent of Documents".**



UNITED STATES GENERAL ACCOUNTING OFFICE  
WASHINGTON, D.C. 20548

NATIONAL SECURITY AND  
INTERNATIONAL AFFAIRS DIVISION

B-217871


The Honorable Claiborne Pell  
United States Senate

Dear Senator Pell:

This report is in response to your letter of February 27, 1984, requesting us to evaluate the broadcast controls of Radio Free Europe/Radio Liberty and the program oversight role of the Board for International Broadcasting and its staff.

As arranged with your office, we are sending copies of this report to the Chairman of the Board for International Broadcasting and the Secretary of State. Copies will also be made available to other interested parties who request them.

Sincerely yours,

  
for Frank C. Conahan  
Director



D I G E S T

Radio Free Europe (RFE) and Radio Liberty (RL) have existed since the 1950s as private, government-financed radio services broadcasting to Eastern Europe and the Soviet Union, respectively. In 1976, the two radios merged into one corporation, RFE/RL, Incorporated; in fiscal year 1985, RFE/RL received a \$108 million U.S. government grant to finance its operations.

Federal oversight of RFE/RL is the responsibility of the Board for International Broadcasting (BIB), an independent government agency. BIB was established to allocate funds to RFE/RL and to evaluate the quality and effectiveness of broadcasts to ensure that the broadcasts complied with programming guidelines and were not inconsistent with broad U.S. foreign policy objectives. (See pp. 1 and 2.)

In 1982, the law was amended to give BIB members corporate responsibilities. The amendment, commonly referred to as the Pell amendment, substantially altered the relationship between BIB and the radios. In essence, there is now a single board responsible for both federal oversight and for making major policy decisions affecting RFE/RL. (See p. 2.)

This report evaluates RFE/RL's broadcast controls and BIB's program oversight activities. The report was requested by Senator Claiborne Pell, who expressed concern that the changes made in RFE/RL's broadcast controls since 1982 increased the potential for violations of RFE/RL programming guidelines. (See p. 5.)

RFE/RL MISSION AND  
POLICY GUIDELINES

RFE/RL's mission is to enhance East European and Soviet citizens' knowledge of developments in the world at large and in their own countries. RFE/RL is not to identify with any

opposition or political groups. Program policy guidelines were established to provide an objective, reliable, and respectable broadcast service. The guidelines provide specific restraints for the tone, language, and manner of presentation such as avoiding emotionalism, vindictiveness, unsupported criticism of the Communist system, and material which could be construed as support for illegal and violent actions.

#### MANAGEMENT CHANGES AT RFE/RL

New RFE/RL management--appointed since 1982--has made several changes, which it said were designed to improve staff morale, enhance journalistic independence, and improve program quality. Some existing program controls were relaxed or eliminated--specifically management's review of scripts before broadcast and identification of news items inappropriate for use. In place of these controls, management increased its reliance on those responsible for preparing and airing broadcasts and on post-broadcast evaluations to ensure that programs conformed to guidelines. BIB also abolished a key RFE/RL position which had focused on policy compliance because the BIB wanted to make the president directly responsible for policy compliance. GAO believes these changes had the effect of lessening management's direct involvement in programming. (See pp. 7 through 9.)

#### Potential violations continue

Departures from policy and guidelines are considered serious because they potentially damage the U.S. image and the credibility of the radios. Comparative data were not available to determine trends. Broadcast Analysis Department, the unit responsible for post-broadcast analysis, identified 18 potential violations in the first 8 months of 1984, and questioned the airing of an additional 29 programs, including those which:

- excerpted a book accusing Franklin D. Roosevelt of conducting "un-American, undemocratic and unconstitutional" methods of provoking war;
- profiled the Jewish assassin of a prominent Czarist-era political figure in a fashion that might be perceived to be anti-Semitic; and

--used an obscenity to describe a Polish government official.

Radio Liberty's Russian Broadcast Service was cited most often for potential violations or questionable broadcasts. Radio Free Europe's Polish Broadcast Service was the second most frequently cited service. (See pp. 9 through 11.)

GAO did not attempt to make independent judgments as to whether specific programs violated policy guidelines.

#### Broadcast controls are not adequate

RFE/RL's procedures and controls for averting violations are hindered by several weaknesses, including (1) not having a senior level focal point to ensure policy compliance, (2) verbal policy guidance not being passed to or, in some instances, being ignored by the broadcast services, (3) broadcast services' staff not following existing instructions or policy, (4) the broadcast analysis function not being sufficiently staffed to review all broadcast services for policy compliance, and (5) not having a system to develop trends, track violations, and ensure corrective action. (See pp. 11 through 18.)

#### BIB OVERSIGHT ACTIVITIES

The Congress clearly intended the expanded BIB to continue independent oversight of RFE/RL programming. The 1982 amendment increased BIB's authority to enforce decisions arising from its oversight activities.

GAO found little documentation of BIB's program oversight activities. BIB files contained no written guidance to RFE/RL concerning broadcast controls. Furthermore, BIB had not effectively used its staff to assist in program oversight, and coordination with outside sources of feedback on programs--particularly the State Department--has decreased.

Also, as of December 1984, BIB had not revised its regulations to reflect its federal oversight and the members' corporate responsibilities. Some BIB members said that it is difficult to distinguish between the two

responsibilities and that when they conduct corporate activities, they automatically conduct oversight. (See pp. 22 through 24.)

#### Staff not used effectively

BIB's four-person, senior-level staff is an important oversight resource. Since 1982, staff oversight activities have decreased in part because the current BIB has not defined the staff's role. As a result, the staff has initiated activities that have been sporadic and unsystematic. The staff no longer regularly investigates outside inquiries about the radios' programming, discusses outside program evaluations with BIB members, or attends and participates in BIB oversight meetings. BIB needs to address the issue of how its staff is to be used. Without doing so, the need to maintain such senior staff is questionable. (See pp. 24 through 27.)

#### Oversight could be enhanced by outside feedback

BIB oversight would be strengthened with increased feedback from outside sources. GAO found that since 1982:

- Foreign service posts no longer provide regular monitoring reports. (See pp. 26 and 27.)
- Coordination between BIB and the Department of State on programming matters has decreased. (See p. 27.)
- Program evaluations by academic specialists and others have not been coordinated between the BIB and RFE/RL. As a result, duplicative studies have been commissioned and coverage of the different broadcast services has been incomplete. (See p. 28.)

#### RECOMMENDATIONS

GAO recommends that the Chairman of BIB, working with the Board:

- Define its program oversight goals and revise regulations governing these activities.
- Determine the role of the BIB's staff in fulfilling the federal oversight responsibility.



--Develop an annual plan for using consultants to evaluate RFE/RL broadcast services which incorporates the needs of both the BIB and RFE/RL.

--Instruct the BIB staff to increase coordination with appropriate Department of State officials.

--Invite the Department of State periodically to send a representative to BIB meetings to provide the Department's perspective on programming issues. (See p. 30.)

GAO is making a number of additional specific recommendations to strengthen broadcast controls and prevent programming violations. (See pp. 19 and 20.)

To carry out these recommendations and to provide the necessary management involvement in the programming process, GAO further recommends that the BIB have the RFE/RL's president establish a senior level position to handle day-to-day programming and policy matters. Further, if the BIB considers that conditions warrant, it may wish to have some pre-broadcast controls reinstated. (See p. 20.)

GAO recommends that the Secretary of State re-emphasize the important role the foreign service posts can play in providing feedback on RFE/RL broadcasts, and provide input to the BIB for use in its oversight responsibilities. (See p. 29.)

#### AGENCY COMMENTS AND OUR EVALUATION

GAO prepared a draft report on its audit work and made it available to the BIB and the Department of State for their review and comment.

In response, BIB provided GAO a number of documents which dealt directly and indirectly with the draft report. Taken as a whole, the material raised concerns about GAO's draft in several key areas, and indicated that, contrary to the draft (1) broadcast violations have actually decreased in recent years, (2) the RFE/RL president was an activist president and thus fully capable to serve as the focal point for policy and program functions, and (3) BIB staff was used fully and effectively.

Furthermore, BIB commented that the focus of the GAO report was too narrow because it concentrated on numbers of errors and did not address broadcast quality and creativity issues. (See p. 6.)

As described in the report, comparable statistics were not available to measure whether violations have increased or decreased. In the absence of comparable data, GAO sought testimonial evidence. The director, Broadcast Analysis Department, informed GAO that in his opinion violations had increased in 1984, and several analysts in that department said they believed violations were up both in numbers and severity. Regardless of the trend, there was agreement that violations continued. GAO's emphasis was on actions to strengthen management controls to avert policy violations because they can damage the credibility of the United States as well as the RFE/RL. (See pp. 9 and 10.)

GAO believes a focal point for programming controls is needed below the level of the president because of his many duties and responsibilities and not because GAO believes he is inactive or unconcerned with programming. GAO's position that BIB staff was not being used effectively was based on extensive interviews with the staff and comparisons of previous and current activities.

Assessing program quality was beyond the scope of GAO's review, and thus GAO is not in a position to comment on the improvements cited by BIB and RFE/RL representatives. GAO recognizes, however, that management has undertaken a number of efforts--including some mentioned in this report--that were aimed at improving programming quality, enhancing creativity, and bolstering morale.

Despite concern about certain characterizations in the draft report, a BIB member tasked with providing comments on the GAO draft to the Chairman of the Senate Foreign Relations Committee stated that the recommendations to BIB have been or will be fully addressed.

Due to its length, the material submitted by the BIB in response to GAO's request for written comments was not included in this report. However, all information was considered and changes were made in the final report as

appropriate. Additionally, the major concerns described above are discussed in the various chapters.

The Department of State commented that changes made since the release of the draft have improved reporting by foreign service posts. The Department also commented that it supports the need for closer coordination with RFE/RL concerning U.S. foreign policy. The Department's comments are included as appendix IV. (See p. 34.)



## C o n t e n t s

|          |  | <u>Page</u> |
|----------|--|-------------|
| DIGEST   |  | i           |
| CHAPTER  |  |             |
| 1        | INTRODUCTION   | 1           |
|          | History and organization of RFE and RL   | 1           |
|          | Mission statement and program policy<br>guidelines provide broadcast<br>guidance | 3           |
|          | Objectives, scope, and methodology   | 5           |
| 2        | RFE/RL BROADCAST CONTROLS NEED IMPROVEMENT                                       | 7           |
|          | Broadcast controls   | 7           |
|          | Potential violations continue  | 9           |
|          | RFE/RL's controls are not adequate   | 11          |
|          | Conclusions  | 18          |
|          | Recommendations to the BIB   | 19          |
|          | Agency comments  | 20          |
| 3        | BIB OVERSIGHT OF RFE/RL PROGRAMMING<br>NEEDS ATTENTION                           | 22          |
|          | Oversight versus corporate<br>responsibilities                                   | 22          |
|          | BIB staff not being used effectively   | 24          |
|          | Oversight could be enhanced by<br>feedback from the Department of State          | 26          |
|          | BIB and RFE/RL should coordinate<br>evaluation efforts                           | 28          |
|          | Conclusions  | 28          |
|          | Recommendations  | 29          |
| APPENDIX |  |             |
| I        | Letter from Senator Claiborne Pell   | 31          |
| II       | Members of the Board for International<br>Broadcasting                           | 32          |
| III      | BIB's response   | 33          |
| IV       | Department of State's comments   | 34          |

### ABBREVIATIONS

|     |                                      |
|-----|--------------------------------------|
| BAD | Broadcast Analysis Department        |
| BIB | Board for International Broadcasting |
| GAO | General Accounting Office            |
| RFE | Radio Free Europe                    |
| RL  | Radio Liberty                        |



## CHAPTER 1

### INTRODUCTION

Radio Free Europe (RFE) and Radio Liberty (RL) have existed since the 1950s as private, government-financed radio services broadcasting to Eastern Europe and the Soviet Union, respectively. In 1976, the two radios merged into one corporation, Radio Free Europe/Radio Liberty, Incorporated (RFE/RL). RFE/RL operates under American management and the statutory oversight of the bipartisan, presidentially appointed Board for International Broadcasting (BIB). The BIB, which is an independent government agency, is authorized by law to assess and evaluate the quality and effectiveness of broadcasts to ensure that RFE/RL broadcasts in a manner not inconsistent with the broad foreign policy objectives of the United States.

The Board for International Broadcasting Authorization Act, fiscal years 1982 and 1983 (Public Law 97-241), contained an amendment which gave BIB members an additional role to serve as the RFE/RL corporate board of directors. The amendment, commonly referred to as the Pell amendment after its principal sponsor, was aimed, in part, at improving RFE/RL's compliance with the established program policy guidelines and tightening controls on RFE/RL broadcasts.

In response to a request from Senator Claiborne Pell, this report evaluates the BIB program oversight activities and the RFE/RL broadcast controls. (See app. I.)

### HISTORY AND ORGANIZATION OF RFE AND RL

Free Europe, Inc., and Radio Liberty Committee, Inc., were founded in 1950 and 1951, respectively. Both corporations were originally funded and supervised by the Central Intelligence Agency. In 1971, connections with the Agency were severed at the direction of the Congress. During a transition period, while the Congress debated the future of RFE and RL, funding for both corporations was provided through the Department of State. The Board for International Broadcasting Act of 1973 created the BIB as a means to fund RFE and RL and provide U.S. government oversight. At congressional and BIB urging, and as recommended by GAO,<sup>1</sup> the two corporations were merged into RFE/RL, Incorporated, in October 1976, to promote economy and efficiency. Responsibility for RFE/RL's major policy, programming, budgetary, and personnel decisions rested with a 25-person corporate board of directors.

---

<sup>1</sup>Suggestions to Improve Management of Radio Free Europe/Radio Liberty (ID-76-55, June 25, 1976)

## BIB members assume corporate responsibility

Over the years, the existence of the two boards--the BIB and the corporate board--caused friction and institutional deadlocks. The problem stemmed from the BIB not having authority to enforce its decisions. Repeated attempts to improve the working relationships between the two boards met with only limited success.

In August 1982, the Pell amendment was enacted to break the institutional deadlocks between the BIB and RFE/RL's board of directors so that decisions arising from BIB's oversight could be effectively implemented. The BIB was expanded from five to nine voting members, and these individuals serve also as the board of directors of RFE/RL. This new arrangement substantially altered the relationship between the BIB and the radios. In essence, there is now a single board responsible both for federal oversight and for making major policy decisions affecting RFE/RL.

The BIB is located in Washington, D.C. The President appoints the nine members with the advice and consent of the Senate. (See app. II for a listing of BIB members.) Terms of the members are staggered so that one-third are reappointed or replaced each year. No more than five members at any one time can come from the same political party. Since the members are expected to serve part-time, the BIB has a full-time federal staff of four Senior Executive Service employees to conduct day-to-day oversight activities of RFE/RL operations.

## RFE/RL organization

RFE/RL, Inc., is a nonprofit organization chartered in the State of Delaware which broadcasts international news and commentary as well as news about domestic and regional developments in the broadcast area to Eastern Europe and the Soviet Union. RFE/RL broadcasts in 21 languages<sup>2</sup> reaching a combined estimated weekly audience of 50 million. In fiscal year 1984, RFE/RL broadcasted on the average about 1,055 hours weekly, of which 365 hours were original programming. RFE/RL employs about 1,700 personnel, and in fiscal year 1985 received \$108 million in a government grant.

RFE/RL's headquarters is located in Munich, Germany, the major site of its programming operations. An office is maintained in Washington, D.C., where various management and special

---

<sup>2</sup>The 21 languages include 9 for broadcast to Eastern Europe (Bulgarian, Czech, Slovak, Hungarian, Polish, Romanian, Estonian, Latvian, and Lithuanian) and 12 for broadcast to the Soviet Union (Russian, Armenian, Azeri, Belorussian, Georgian, Kazak, Kirghiz, Tajik, Tatar-Bashkir, Turkmen, Ukrainian, and Uzbek).



programming functions are performed. In addition, news and programming bureaus are maintained in New York, London, Paris, Brussels, Bonn, and Rome. Transmitter sites are located in Spain, Portugal, and Germany.

RFE/RL, Inc., is headed by a president, who is the chief executive officer with overall responsibility for managing the day-to-day operations and supervising the broadcasts. Assisting the president are the RFE and RL directors, who provide policy, program planning, and control, and coordinate the various programming and research components. These officials along with the senior vice president for administration form the senior RFE/RL management, which establishes the internal management policies, procedures, and structures necessary to ensure that broadcasts are in line with RFE/RL's mission and policy guidelines. These positions are normally filled by Americans.

The radios comprise 20 broadcast services, each devoted to a language (for example, the Russian Service, the Romanian Service, and so forth). RFE, which broadcasts to Eastern Europe, has 8 broadcast services and RL, directed at the Soviet Union, has 12 broadcast services. The broadcast services are responsible for planning, preparing, and broadcasting programs to their respective areas. Each broadcast service is headed by a director and staffed by writers, editors, and announcers. Because the positions require language facility and knowledge of conditions in the target area, a high proportion of the broadcast services' staff is drawn from the emigre population.

Several centralized operations under the president contribute to RFE/RL programming. The Central News Division is responsible for preparing the newscast and news-feature material for all broadcast services. Another centralized unit--the Broadcast Analysis Department (BAD)--evaluates broadcasts for quality, suitability, and policy compliance. The analysts read or listen to broadcasts, prepare daily summaries of programs, and report policy violations in writing to the RFE/RL president. BAD also prepares regular reports on program content, translations, and special studies.

MISSION STATEMENT AND  
PROGRAM POLICY GUIDELINES PROVIDE  
BROADCAST GUIDANCE

The RFE/RL mission statement prepared by the BIB and the program policy guidelines prepared by RFE/RL are the two basic documents that provide guidance for broadcasts. Both documents were prepared in consultation with the Department of State and are used by all parties as the basis for program guidance and evaluation.

## Mission statement

RFE/RL's mission is to encourage a constructive dialogue with Eastern Europe and Soviet Union citizens by enhancing their knowledge of developments in the world at large and in their own countries. In pursuing this mission, RFE/RL programs, among other things, report basic world news; communicate a broad range of world press reports, analysis, and opinion; and broadcast and critically analyze works of political significance or cultural merit produced by East European or Soviet citizens.

In accordance with their mission, RFE and RL are required not to identify with any opposition groups or political parties located inside or outside of the broadcast area. In broadcasts about the United States, RFE/RL is required to objectively report problems and setbacks as well as achievements. The mission statement identifies the languages in which RFE/RL will broadcast and requires objective and accurate reporting. It emphasizes the integrity of the broadcasts and states that RFE/RL should broadcast in a manner not inconsistent with broad U.S. foreign policy objectives.

## Program policy guidelines

The program policy guidelines were established to provide an objective, reliable, and respectable broadcast service. In defining editorial policies, the guidelines state that accuracy and objectivity are essential and that inaccurate, biased, or carelessly prepared material damages the reputation of RFE/RL. The principal criterion for selection of broadcast materials is relevance of the information to the needs and interests of the audience--that is, whether such news, analysis, or other information will contribute to the listeners' knowledge of significant developments and trends in or affecting their area. Broadcast information must neither be used nor omitted because it may seem favorable or unfavorable to either the East or the West.

In addition to the editorial policies, the guidelines provide specific restraints for the tone, language, and manner of presentation. Specifically, the guidelines require that all broadcasts avoid the following:

- emotionalism, vindictiveness, belligerency, pretentiousness, or condescension;
- sweeping generalization, propagandistic argumentation, gratuitous value judgments, or unsupported criticism of the Communist system;
- any programming, the content of which could be legitimately construed as inflammatory;

- material which could be reasonably construed as incitement to revolt or support for illegal and violent actions;
- tactical advice, particularly recommendations for specific action;
- programs which are based upon or use rumors or unsubstantiated information; and
- material which could be characterized as petty gossip, slander, or spiteful reference to or attack on the personal lives or families of government or party leaders.

#### OBJECTIVES, SCOPE, AND METHODOLOGY

This report was initiated at the request of Senator Claiborne Pell, Senate Foreign Relations Committee, in his February 27, 1984, letter. Senator Pell expressed concern that the changes made in RFE/RL's broadcast controls since 1982 increased the potential for broadcast violations. Our objectives were to evaluate RFE/RL's broadcast control procedures and review the oversight role of the BIB and its staff as it relates to programming. We did not attempt to compare the quality of programs before and after 1982 nor did we attempt to make independent judgments as to whether specific broadcasts violated the policy guidelines. We also did not address BIB's other responsibilities, such as financial and technical oversight.

The report is based primarily on work done at RFE/RL, Inc., in Munich, Germany, and the BIB in Washington, D.C. We reviewed BIB's regulations, RFE/RL's mission statement and program policy guidelines, internal and external evaluations of RFE/RL programming, policy memorandums issued by RFE/RL management, BIB's official files, and minutes of the BIB and RFE/RL corporate meetings. We attended daily policy meetings held by RFE and RL to obtain an understanding of management's involvement in program content decisions. We reviewed potential broadcast violations and other concerns identified by the BAD, discussed these with RFE/RL management and broadcast service staff, and followed up to determine corrective actions taken. Our work included discussions with past and present RFE/RL management, broadcast service directors, and broadcast analysts. We held discussions with the BIB's chairman, most of its members, and all of its staff. Although we did not visit foreign service posts in Eastern Europe and the Soviet Union, we did develop information on their monitoring of RFE/RL broadcasts at the American Consulate, Munich, and the Department of State, Washington, D.C.

Our review was performed between July and October 1984 in accordance with generally accepted government audit standards.

We prepared a draft report on our audit work and made it available to BIB and the Department of State for their review and comment. In response, BIB provided us with a number of documents which dealt directly or indirectly with the report. These included (1) comments on the draft report by a BIB member to the Senate Foreign Relations Committee, (2) an internal RFE/RL memo to the president from his special assistant commenting on the draft report, and (3) several internal RFE/RL memoranda from the president to various officials dealing with topics addressed in the report. We examined each of these documents and made changes as we considered appropriate for the final report. We also discuss the major issues raised in the documents in appropriate sections of the report. The Department of State provided comments which are included as appendix IV and have been incorporated into the report.

## CHAPTER 2

### RFE/RL BROADCAST CONTROLS NEED IMPROVEMENT

Since the Pell amendment, the new board has exercised its corporate authority, including the appointment of new management for the radios. This management team made several changes, which they said were designed to improve morale and enhance journalistic independence. Some existing program controls were relaxed or eliminated--specifically management's review of scripts before broadcast and identification of news items inappropriate for use. In place of these controls, management increased its reliance on the radios' broadcast services and on post-broadcast evaluations to ensure that programs conformed to guidelines. The BIB also abolished a key RFE/RL position which had primarily focused on policy compliance and placed the responsibility with the president of RFE/RL.

RFE/RL can strengthen its controls by establishing a high level focal point for policy compliance, by improving methods for disseminating management policy decisions, by ensuring better compliance with existing control procedures, by adequately staffing key compliance functions, by taking action to ensure that employees do not repeat violations, and by conducting annual program reviews for each broadcast service.

#### BROADCAST CONTROLS

RFE/RL has a range of broadcast control options available to help ensure that programs comply with established policy guidelines. Controls are basically of two types: pre-broadcast controls, which can prevent violations before programs are aired; and post-broadcast controls, which evaluate programs after they are initially aired. Post-broadcast controls are useful in preventing rebroadcast of an offensive program and in identifying corrective action needed to prevent future violations.

Management has discretion in deciding what it believes to be adequate control procedures. Controls can range from exhaustive management review of all material before it is broadcast, to reliance on the journalistic integrity of broadcasters. The appropriate degree of control is a subject of considerable debate between those who favor more and those who favor less control. Those favoring more control contend that controls are necessary to ensure that broadcasts, prepared largely by emigre staff, are in the best interests of the United States. Those favoring less control complain that controls are a form of censorship which inhibits creative programming and adversely affects morale.

The appointment of a new management team since 1982--the RFE/RL president, senior vice president for administration, and the two radio directors--resulted in changes in RFE/RL broadcast controls. The new management viewed some of the previous controls as demeaning to professional journalists. According to the BIB's chairman and RFE/RL's president, allowing greater autonomy would foster higher morale and better quality programming. The president reasoned that since the staff of the broadcast services are primarily former East European and Soviet citizens, the services could best decide what interested the target audiences.

#### New control policies

In keeping with the policy of increased authority and autonomy of the broadcast services in making program decisions, the new management team:

- relaxed or eliminated some control mechanisms and
- relied on post-broadcast reviews to keep management informed on violations and of the need for corrective action.

In essence, RFE/RL management delegated the decisions on what to broadcast to the broadcast services. Broadcast service directors were responsible for compliance with the policy guidelines along with day-to-day programming authority. According to RFE/RL's president, management recognized that risks were involved in relinquishing this authority, but believed these were outweighed by better quality programming and higher staff morale.

To allow the broadcast services to exercise internal control over policy and programming, management no longer conducts pre-broadcast reviews of RL scripts. That decision was based on the view that pre-broadcast reviews unduly restricted the broadcast services' staffs and did not guarantee compliance since, according to RFE/RL's president, some violations occurred even with pre-broadcast reviews.

Similar rationale led to the deemphasis of the Recommended List, which was a mechanism used to select wire service news articles for broadcast. Policy specialists in RFE/RL compiled this list in three categories: (1) articles required for use in programming, (2) "background information only" articles which were considered inaccurate and not to be used in programming, and (3) "clear attribution only" articles which could be used in programming if the source was identified during the broadcast.

The Recommended List is still published, but news articles on the list are no longer mandatory for programming. Also, news

articles are no longer identified as inaccurate or "clear attribution only." RFE/RL management stated that the broadcast services are best qualified to determine the suitability of source material and its relevance to their listeners.

During a January 1983 reorganization, management looked for, in the words of the RL director, an approach that ". . . converts the negative activity of control (as exemplified by Broadcast Analysis) to the positive and stimulating activity of program planning and guidance [and] to long term editorial direction. . . ." RFE/RL's president approved this approach and, as a result, a RL Program Support Group was created to provide research material and guidance to the broadcast services which could be used at their discretion in making programming decisions. This group replaced the previous system of American program managers overseeing the broadcast services.

The following example shows the value attached to autonomy for the broadcast services. After a broadcast in August 1984--which BAD characterized as anti-Semitic and the most offensive program aired by the Russian Service in 10 years--the RL director issued a directive requiring that all program scripts discussing Jews or Judaism be submitted to him for approval. Two days later, the director repealed his directive, saying that he did not want to interfere with the broadcast services' authority to make programming decisions.

According to RFE/RL management, when it relaxed or eliminated some pre-broadcast controls, it increasingly relied on post-broadcast controls to identify policy violations and to ensure that management was aware enough of such situations to take corrective action. It depended on BAD post-broadcast reviews of program scripts. There was also a variety of other sources available to help in monitoring broadcast content--including feedback on programs from embassies, emigre organizations, and foreign governments; BIB staff reviews; Program Support Group guidance; and program reviews of individual broadcast services.

#### POTENTIAL VIOLATIONS CONTINUE

Departures from policy and guidelines are considered serious because they potentially damage the U.S. image and the credibility of RFE/RL. BAD is the key RFE/RL unit responsible for identifying potential violations and performing post-broadcast reviews of programs. (As discussed on pages 14 and 15, BAD has not provided the intended program coverage, and as of August 1984, BAD had not reviewed most of RL's broadcast services for over a year.)

Comparing information from different time periods was difficult. Available information often covered a number of different kinds of errors, inaccuracies, and minor deviations as

well as potentially serious policy violations. For example, certain 1981 studies cited by BIB and RFE/RL as an indication that violations had decreased addressed minor errors in fact, use of "background-information-only" articles, and other inaccuracies not identified as "violations" by BAD. Another complication is that before August 1984, BAD's reported violations were not recognized as formal violations until concurred in by either the directors of RFE and RL or the president. Since August 1984, the concurrence of the president has been required.

In the absence of comparable data, we sought testimonial evidence. The director of BAD said he believed that violations and questionable broadcasts had increased in 1984. Several BAD analysts said they believed that violations were up both in numbers and severity. The RFE/RL president said in response that this may have been due to his instructions to BAD to raise more questions. BAD identified 18 potential violations in the first 8 months of 1984 and questioned the airing of an additional 29 programs. The programs cited as potential violations or questionable broadcasts by BAD included those which

- excerpted a book accusing Franklin D. Roosevelt of concealing his foreknowledge of the Japanese attack on Pearl Harbor and of conducting "un-American, undemocratic and unconstitutional" methods of provoking war;
- referred to the Soviet foreign minister as a bandit;
- compared former Soviet officials to Nazi war criminals;
- carried an interview suggesting violent action by Soviet soldiers in Afghanistan against their superiors;
- called a British author a Communist agent;
- profiled the Jewish assassin of a prominent Czarist-era political figure in a fashion which could be perceived as anti-Semitic;
- used an anatomical obscenity to describe a Polish government official;
- called on Polish citizens to boycott elections;
- described a prominent American actress as having a pro-Marxist outlook and "warm sympathies" for the Soviet Union;



- named minor Polish government officials accused of torturing political prisoners by the Polish underground;
- portrayed the West and Christianity unfavorably; and
- were prepared by the Solidarity Abroad organization in Brussels, Belgium. (BAD questioned whether the Polish Service was "turning over its broadcast facilities to an exile group in the west," contradicting guidelines that RFE/RL not associate with specific exile groups.)

In August 1984, BAD cited the RFE and RL directors for possible violations. The two directors advised their respective broadcast service directors not to air news items about President Reagan's "joke" regarding the bombing of the Soviet Union. RFE/RL Central News Division said the item was reported by the Associated Press and others, but the directors said they did not believe the news item was adequately substantiated. According to BAD, this decision violated the guidelines stipulating that news not be omitted because it might unfavorably portray the West. (The president, RFE/RL, did not concur with BAD's determination that this instance constituted a violation.)

In January 1985, after we completed our work, the RFE/RL Polish Service broadcasted a program comparing Polish leader General W. Jaruzelski with Adolf Hitler. The Polish government lodged a formal protest with the U.S. Embassy in Warsaw. One Polish government official called the program "hostile" and "insulting" to Polish people. The Department of State, in an unusual move, issued a formal response stating that:

"The U.S. government disassociates itself from that broadcast and regrets any implication of similarity between Nazi Germany and present-day Poland, and particularly between Adolf Hitler and General Jaruzelski."

RL's Russian Service was cited most often for violations or questionable broadcasts. During the first 8 months of 1984, the Russian Service was cited an average of two to three times per month, including five times in May. RFE's Polish Service was the second most frequently cited service.

#### RFE/RL's CONTROLS ARE NOT ADEQUATE

RFE/RL's management processes and controls for averting violations are hindered by certain weaknesses and deficiencies.

- After the position of the executive vice president for programs and policy was eliminated in 1982, there was no focal point below the president to ensure program policy compliance.
- Verbal policy guidance was not passed to or, in some instances, was ignored by the broadcast services.
- The broadcast services' staffs were frequently writing, editing, approving, and airing their own material, counter to RFE/RL policy. Additionally, the RFE/RL bureaus were not providing program scripts to services as directed by the RFE/RL president.
- BAD has insufficient staff to regularly conduct post-broadcast reviews on all programs.
- Steps to ensure follow-up and corrective action on violations were erratic, and violations were sometimes repeated.

No focal point for  
policy compliance

RFE/RL management formerly exercised program and policy control through an executive vice president for programs and policy, who chaired daily policy meetings, selectively reviewed sensitive scripts before broadcast, and resolved day-to-day policy and programming issues. Policy violations were reported directly to the vice president. According to the former vice president, he would review each case, discuss it with the respective broadcast service, take corrective action when appropriate, and report the final disposition to BAD. (As discussed on pages 16 and 17, this sequence of events is currently not taking place.)

In 1982, BIB eliminated the position of executive vice president for programs and policy in an attempt to make the president more accountable for programming decisions. The president told us that the responsibilities of the vice president are now concentrated in his office. The president is responsible for all corporate, management, and administrative aspects of RFE/RL, Inc. He is also a non-voting member of the BIB, and has served as special U.S. ambassador to an International Conference on Population. Because of his extensive responsibilities, RFE/RL's president is limited in the amount of time and constancy of attention which he can devote to programming and policy matters.

In material provided in response to our report, BIB and RFE/RL officials stated that the RFE/RL president is an activist president who is involved in policy and program functions and

serves as the focal point for programming. We believe a focal point for programming is needed below the level of the president because of the many duties and responsibilities already performed by the president and not because he is not active or concerned with programming.

Informal communication  
causing compliance problems

Before 1982, RFE/RL disseminated in writing, through the Recommended List, policy guidance from the daily meetings to the broadcast services' staff. While RFE/RL still conducts daily policy meetings, decisions from these meetings are now verbally communicated to the staffs of the 20 broadcast services. Each morning, the president of RFE/RL meets with the RFE and RL directors and other management officials. Participants in the morning meetings sometimes discuss news service items and whether or not the broadcast services should use them. RFE/RL management told us that it relies on the participants to verbally transmit the results of the meetings to the broadcast service staff. Following the president's meeting, the RFE director meets with his broadcast service directors to provide broad programming and policy guidance. The RL director meets with the Russian Service director and RL's Program Support director, whose staff serves as liaison between management and the RL Nationality Service directors.

We found that verbal policy guidance has not always been communicated. For example, we identified several instances where the broadcast services used news items which management had decided should not be used. However, broadcast service officials said they were not notified of management's decision.

In some cases, written guidance is not received. During our review, RFE/RL management instructed the broadcast services in writing not to use a particular wire service item. Two services used the item because they said that they did not receive the memorandum.

Broadcast services' staffs  
not following existing policy

RFE/RL officials said that the broadcast service writers and editors are expected to understand and apply the program policy guidelines in compiling programs. Thus, the program writers in RFE's 8 and RL's 12 broadcast services provide the first point of screening for policy compliance. The second screening point for policy is the editors, who should identify any mistakes made by the writers. Each service has several senior editors, who are responsible for approving all programs. RFE/RL management believes that the responsibility for writing and editing must be kept separate. During our review, we identified programs where the broadcast service staff wrote, edited, approved, and aired their own material. Three broadcast

service directors said that this occurred frequently, especially on weekends, because there were not enough resources to provide independent checks.

In an April 4, 1984, memorandum, RFE's director wrote the following to his five broadcast service directors:

"In my memorandum of 13 March I advised you that no program may be put on the air in Radio Free Europe without the signed approval of a supervising editor. In the meantime there have been further instances where the writer of a program also figured as his own supervising editor. I must make it clear that this runs counter to elementary rules of control as well as my memorandum and cannot be tolerated."

RFE/RL's president also stated that writers approving their own scripts violate RFE/RL policy, but that he was aware of only a few instances where this occurred. We found, however, that it occurred frequently. For example, during the first 10 days of September 1984, two RFE broadcast services each aired a total of 29 programs in which the program editor also wrote part or all of the program. This included one program written and approved by one individual, which aired all 10 days, and an instance in which the service's deputy director wrote, approved, and aired two editorials. One broadcast service director told us he regularly approved his own material on Sundays, because no one was around to review it.

In RL, we examined between 7 and 11 days of programming from six broadcast services and found that each service director wrote and approved his own material nearly every day. In one day's programming for another service, several writers, including a correspondent in the United States, approved their own programs.

Another area of noncompliance concerns program scripts. In February 1984, the RFE/RL president instructed that all such programs received from RFE/RL's bureaus in the United States and Europe were to have written program scripts. We found, in September 1984, that some of these programs were still aired without the written scripts, and that the scripts of broadcasts were not on record.

BAD not adequately  
staffed

With the relaxation of some broadcast controls, RFE/RL increasingly relied on post-broadcast reviews by BAD to spot policy violations. However, we found that:

--BAD has not reviewed the majority of RL's broadcast services in more than a year.

--BAD spent most of its time summarizing rather than analyzing broadcasts.

Consequently, RFE/RL management could not be assured that it was being informed about all violations which might be occurring.

BAD analysts are responsible for reviewing all programs for each RFE/RL broadcast service. On a daily basis, the broadcast analysts are supposed to listen to each broadcast tape or read the program script for, among other things, policy compliance. As noted in a previous GAO report,<sup>1</sup> BAD is the key element in providing timely assurances that RFE/RL programs meet established program policy.

In 1983, however, RFE/RL management transferred part of the BAD staff to the new RL Program Support Group to provide programming information for the broadcast services. As a result, the majority of RL's broadcast services had not been reviewed for policy compliance in more than a year. After transfer of the broadcast analysts, we found that BAD had no capability to review 11 of the 15 RL broadcast services for program policy compliance between May 1983 and August 1984. BAD hired two analysts in September 1984 who will be responsible for reviewing three of the broadcast services. BAD's director said funds were available for additional hiring of analysts and that analysts for the other eight broadcast services were being recruited.

RFE/RL's president stated that he supports BAD's work, but he approved the broadcast analysts' transfer because he wanted to start the new unit immediately and hoped that BAD could recruit replacements faster than has been the case. The president also said the new Program Support staff were told to report policy violations. BAD's director said that one policy violation was reported by Program Support in 16 months. One Program Support staff member stated that although she notified management about two potential violations, nothing was done. As a result, she said that she became discouraged from pointing out violations and placed virtually no emphasis on whether programs complied with the guidelines but concentrated on other required duties.

Program summaries most time  
consuming function of analysts

BAD is also responsible for preparing daily summary reports for all RFE/RL programs. These reports do not provide an analysis of program content, but rather summarize what the broadcasts are about. The Department director informed us that preparing the 85 pages of these broadcast summaries per day is the Department's most time consuming function. (Broadcast analysts told

---

<sup>1</sup>Improvements Made, Some Still Needed In Management of Radio Free Europe/Radio Liberty (ID-81-16, March 2, 1981)

us that if they were not required to prepare these summaries, they would have more time to critically analyze programming.)

BAD's director said it is necessary for his Department to prepare the daily summaries because they are the principal source for various statistical and special reports which he is required to make. Other RFE/RL officials emphasized the need to have independent viewpoints in summarizing what was broadcast. BIB staff said these summaries were particularly useful.

We found, however, that summaries for several broadcast services were not always done, or were prepared by the broadcast services staff. Six RL broadcast services prepared their own summaries, three of them regularly. This is due largely to the reorganization which shifted several of BAD's staff to RL's Program Support Group. In a July 3, 1984, letter to RFE/RL's president, the executive director of BIB's staff stated that daily summaries were not being prepared as required. In response, RFE/RL's president stated that this was a serious omission and that it would not occur again. In a July 12, 1984, memorandum, RFE/RL's president reminded the staff of the requirement to prepare the daily summaries. However, our review of the daily broadcast summaries for August and September 1984 disclosed that summaries for several RFE/RL broadcast services were not regularly prepared. The director of BAD informed us that eventually summaries would be prepared as time and staff permitted.

Follow-up system  
does not ensure corrective action

During our review, we identified deficiencies in management's system for following up on potential violations to ensure that identified policy deviations are not repeated.

- Management frequently does not formally respond to or resolve issues raised by BAD.
- BAD does not summarize violations or develop trend data to determine if there are broadcast problems with individuals, programs, or entire services.

Management does not usually  
respond to BAD's concerns

BAD notifies the president in writing when a potential violation occurs. However, there is no formal system for discussing and resolving these concerns with the broadcast services and providing feedback to BAD on the final outcome. As a result, BAD does not know whether the violation was substantiated and whether to be aware of similar situations in the future.

We found that RFE/RL management had not responded in writing on more than half of the potential violations that BAD noted in the first 8 months of 1984. The directors of RFE and RL stated that all concerns brought to their attention were discussed and many were resolved informally. We found, however, that the BAD's director and staff were unaware of the disposition of many of the concerns raised and what, if any, action had been taken. We also found several cases where broadcast service directors were unaware that BAD had cited violations against their services because management did not bring the violations to their attention. For example, two violations cited against the Polish Service in August 1984 were not raised with the service director. Also, the Russian Service director was unaware of about 20 percent of the concerns cited against his service in 1984.

No system exists for developing trends on and tracking violations

BAD does not record and summarize potential violations which it identifies and concerns which it raises when conducting program reviews for policy compliance. Currently, when BAD identifies a violation, it notifies RFE/RL's president and normally has no further involvement. Because this information is not summarized on a cumulative basis, RFE/RL management does not know whether violations are increasing, decreasing, or whether other systemic problems exist.

There is also no system for spotlighting repeated violations. For example:

--In 1983, the American Consulate in Munich notified RFE/RL regarding vulgarities in Polish Service programming. RFE management met with Consulate officials and agreed to correct the problem. In March 1984, another program containing vulgarities toward a Polish government official was aired.

--We discussed the broadcast by the Solidarity Abroad organization over RFE's Polish Service with the RFE director. The director agreed that this broadcast violated the guidelines and told us he reprimanded the broadcast service director and took the program off the air. However, the Polish Service director told us this program was still being aired.

BIB members, RFE/RL's president, BAD's director, and other officials stated that summarizing violations would be useful and could be used to produce periodic reports--monthly, quarterly, or semiannually--showing trends in violations. These reports could also help identify particular individuals, programs, or

complete broadcast services which might require special attention. In addition, as discussed on page 28, this information could also be used by the BIB and its staff to carry out oversight responsibilities. After we completed our review work, RFE/RL stated that such reports were being prepared.

#### Annual program reviews for each broadcast service not being conducted

Program reviews for individual broadcast services are not conducted on a regular basis. According to a former RFE/RL vice president, program reviews--which management had generally conducted on an annual basis--provided an opportunity for management and the broadcast service staff to discuss programming strengths and weaknesses with the objective of making program and program scheduling improvements. Most broadcast service directors said that they have not had a program review since the new RFE/RL management was appointed. The director of RL's Russian Service said that a review was made in early 1984, but it covered only one program.

In a June 1984 internal report to RFE/RL's president, it was recommended that annual broadcast service assessment reviews be conducted for RFE's five broadcast services and RL's Russian Service. The recommendation called for RFE/RL management, the director of RFE or RL, the broadcast service director, as well as the directors of BAD and Audience Research,<sup>2</sup> to discuss and evaluate program information developed by BAD and Audience Research. The report did not mention the use of program information provided by sources outside of RFE/RL, such as the foreign service posts and the BIB's staff. At the completion of our work in Munich in September 1984, RFE/RL management had neither conducted nor scheduled any program reviews.

#### CONCLUSIONS

Some changes which management made to increase the broadcast services' autonomy--such as eliminating a high-level focal point position, reducing staff in the broadcast analysis function, and relaxing some pre-broadcast controls--have weakened its ability to prevent violations of program guidelines. Furthermore, management is often unaware of the extent to which certain procedures, such as editorial checks, are carried out, and it has no system to highlight recurring violations patterns.

The method used to ensure compliance with policy guidelines is a management choice. In the past, RFE/RL management has used

---

<sup>2</sup>RFE/RL's East European and Soviet area Audience Research Departments, among other things, survey East European and Soviet citizens traveling in the West to measure the performance of RFE and RL and to assist in increasing RFE/RL's effectiveness as broadcasting media.



both pre-broadcast and post-broadcast controls to ensure compliance. To strengthen the current policy of relying heavily on post-broadcast reviews, the following need to be in place:

- a reliable system for communicating policy,
- assurance that existing policies are being followed,
- a sufficiently staffed group to carry out post-broadcast reviews,
- follow-up procedures to make certain that corrective action has been taken on cited violations, and
- periodic assessments of program content.

A high-level focal point is needed to direct the necessary attention to policy compliance issues, especially to follow up on reported violations, provide feedback, and assure corrective action. Involvement at this level is a necessary exercise of management's responsibility to attain quality and accurate broadcasts. This has been weakened since the position of executive vice president for programs and policy has been eliminated.

BAD is a critical element in the RFE/RL compliance process. Due to organizational and staffing deficiencies, BAD is not providing timely, comprehensive information to management. Since the elimination of the vice presidential position, BAD often has not received feedback on its reported violations, leading to uncertainty. Furthermore, recruitment to replace former BAD analysts transferred within RFE/RL has been slow. If staff shortages continue, RFE/RL management may need to consider having some other groups, such as the broadcast services, prepare and issue the daily summaries so that BAD can concentrate on analysis.

#### RECOMMENDATIONS TO THE BIB

We recommend that the Chairman of the BIB, working with the Board, have the president of RFE/RL take the following actions:

- Formally disseminate written program and policy decisions resulting from the various daily policy meetings, including decisions to use or not use certain news articles, to the broadcast services. This information should also be provided to the BAD so that checks can be made to ensure the broadcast services have complied with policy decisions.

- Reaffirm existing policy that the responsibility for writing and editing program material be kept separate, and take steps to ensure compliance.
- Ensure that the BAD is adequately staffed to provide post-broadcast evaluation on all RFE and RL services.
- Establish a formal system to ensure that all concerns raised by the BAD are fully discussed by RFE/RL management and communicated to the broadcast services, when appropriate, and that formal responses are provided to the BAD.
- Compile and regularly publish reports on trends in policy violations for each broadcast service and provide these to the BIB and its staff. Depending on the results of these reports, it may be necessary to establish a system for selective pre-broadcast reviews by the BAD when recurring problems exist with specific writers, programs, or complete services.
- Conduct periodic program reviews of each broadcast service to evaluate all internal and external program feedback and make recommendations for program improvements.

In order to carry out these recommendations and to provide the necessary constant management involvement in the programming process, we also recommend that the BIB have the president establish a senior level position to handle RFE/RL's day-to-day program and policy matters.

If BIB believes the conditions warrant--after considering the contents of this report--it may wish to reinstitute certain pre-broadcast controls, as well as strengthen post-broadcast controls.

#### AGENCY COMMENTS

The BIB member tasked with providing comments on our draft to the Chairman of the Senate Foreign Relations Committee objected to the scope of the draft, because in his view it focused on numbers of errors and did not address broadcast quality concerns. He also disagreed with a number of characterizations of RFE/RL controls. In particular, he stated that violations had decreased since 1982.

We agree that our report does not address quality issues, nor was it intended to do so. Our work focused on the effectiveness of programming controls and changes made in those controls since 1982.

As we describe in the report, comparable statistics were not available to measure whether violations have increased or decreased. Records and reports issued at different time periods used different definitions for "violations."

We address the above, and other concerns, in the appropriate sections of the report. Even though some concerns were expressed, the BIB member stated that our recommendations concerning RFE/RL broadcast controls are being implemented.

### CHAPTER 3

#### BIB OVERSIGHT OF RFE/RL PROGRAMMING NEEDS ATTENTION

The Congress clearly intended for the expanded BIB to continue independent oversight of RFE/RL programming. One of the purposes of the 1982 amendment increasing BIB's authority was to give the BIB enough clout to enforce decisions arising from its oversight activities.

Very little documentation exists relating to BIB program oversight activities. While BIB files contained some discussions of programmatic concerns, including alleged violations, we did not find any formal BIB guidance or direction to RFE/RL concerning the need for changes in broadcast controls. Also, we found that:

- The BIB has not effectively used its staff for oversight since 1982.
- BIB's coordination with outside sources of feedback on programs--particularly the State Department--has decreased.

BIB needs to define its program oversight goals and develop an approach to achieving them which effectively uses its own staff, as well as outside feedback sources.

#### OVERSIGHT VERSUS CORPORATE RESPONSIBILITIES

The Board for International Broadcasting Act of 1973, as amended, authorizes BIB, among other things,

- "to review and evaluate the mission and operation of RFE/RL, Incorporated, and to assess the quality, effectiveness and professional integrity of its broadcasting within the context of the broad foreign policy objectives of the United States," and
- "to develop and apply such evaluative procedures as the Board may determine are necessary to assure that grants are applied in a manner not inconsistent with the broad foreign policy objectives of the United States Government."

To carry out its responsibilities as envisioned by the act, BIB adopted, in February 1980, regulations (Title 22, Code of Federal Regulations, Chapter 13) prescribing the manner in which it would operate. The regulations establish, among other things, the procedures for RFE/RL advising BIB of policy

violations, RFE/RL sharing with BIB various internal reports on program violations and program assessments, and BIB conducting program evaluations.

Since the Pell amendment, BIB has not changed the regulations to reflect the dual role of its members--federal oversight and corporate responsibilities. Some BIB members expressed the view that it is difficult to distinguish between their two responsibilities and that when they conduct corporate activities, they automatically conduct oversight.

In recognition of the members' dual responsibilities, separate oversight and corporate meetings are convened. Also, separate minutes are maintained. According to the minutes, most of the meetings focused on "corporate" responsibilities, with relatively little time spent on issues specifically identified as "oversight." It appears that the oversight meetings, which generally lasted from 20 to 30 minutes, were convened to fulfill the requirement that a meeting be held.

We found that the minutes of the corporate meetings for fiscal year 1984 were detailed, highlighting discussions on such topics as the annual budget, the structure at daily policy meetings, and personnel matters. On the other hand, minutes from oversight meetings contained little discussion on any single topic. The minutes from the BIB's April 1984 meeting identified only when and where the meeting was held and who attended. Our review of minutes from oversight meetings before August 1982 showed that the meetings generally lasted all day and involved detailed discussions on such topics as congressional decisions affecting RFE/RL, the relocation of RFE/RL operations, jamming problems, and the budget.

We found little additional documentation at either BIB or RFE/RL that would indicate the extent of BIB oversight of programming. According to BIB and RFE/RL records, BIB's program committee, made up of three BIB members, reviews RFE/RL programming for the purpose of enhancing the quality of programs and reviews violations when brought to their attention. We were told by two members of the committee that they rely on the "grapevine" or the BIB staff to keep them advised of potential broadcast violations. Although required in BIB regulations, the program committee does not receive the reports on program violations from BAD.

We looked for, but did not find, any guidance or directions issued by the BIB to RFE/RL as a result of its review of reported programming violations. The BIB chairman told us we would not find much in the way of formal communications. He said BIB guidance was generally handled informally with the RFE/RL president who, as a non-voting member of the BIB, attends BIB sessions.

Members of the BIB staff believe that BIB oversight has suffered because BIB members spend most of their time on corporate matters. Furthermore, the staff said some BIB members have reacted defensively to criticism of the radios and that the BIB's chairman had issued instructions for the staff to stress more positive aspects about RFE/RL broadcasts.

BIB STAFF NOT BEING  
USED EFFECTIVELY

Since the BIB was expected to serve part-time, the Congress authorized a full-time staff, currently composed of four Senior Executive Service employees for administrative and support staff, to carry out the day-to-day oversight of RFE/RL. The important role of the staff in fulfilling BIB's oversight responsibility is described in the report of the committee of conference<sup>1</sup> which stated that:

"Federal oversight of such a complex and politically sensitive enterprise must be continuous; it cannot be suspended for weeks or months at a time while waiting for Board members to meet or to be appointed by new administrations. That is why the original legislation provided for a full-time Federal staff drawn from the competitive service. The present BIB staff has maintained that continuity of oversight over the years. It is the expectation of the committee of conference that this indispensable function of the BIB staff--totally separate from RFE/RL operational management--will continue to be exercised effectively under the new arrangement."

We found that the BIB is not effectively using its staff resources. The BIB has not provided guidance to its staff on oversight activities or revised its regulations, thus staff efforts and involvement in oversight have decreased significantly since 1982. Two BIB members told us they have not placed a great deal of emphasis on defining the staff's oversight role because of higher priority matters, such as the RFE/RL budget.

The BIB's staff said that while they were never instructed to discontinue their previous activities, the absence of guidance from the BIB and the perceived reluctance on the part of the BIB to address the staff's findings discouraged them from continuing to conduct those activities. According to the staff,

---

<sup>1</sup>House Report 97-693, dated August 3, 1982, Committee of Conference on Authorizing Appropriations for Fiscal Years 1982 and 1983 for the Department of State, United States Information Agency, and the Board for International Broadcasting.

they have initiated their own activities which, as a result, have been sporadic and unsystematic. Staff members believe they have flexibility to do what they want, as long as their work does not reflect negatively on RFE/RL.

Staff oversight  
activities have decreased

The following examples, provided by the BIB staff, show the staff's activities before August 1982 and the extent to which those activities have decreased today.

Staff activities  
before August 1982

Staff activities  
after August 1982

Conducted reviews of RFE/RL programs and language services and reported orally at BIB meetings or through formal reports.

Conduct some evaluations of RFE/RL programs, technical effectiveness, or organizational changes and provide formal reports.

Investigated foreign government, media, emigre organization, and other inquiries about RFE/RL broadcasts.

No longer routinely investigate outside inquiries about RFE/RL programming.

Reviewed RFE/RL budget presentations from program enhancement and policy control standpoint.

No longer review budget presentations. Presently, this is handled between BIB's chairman and RFE/RL management.

Selected and supervised outside specialists to perform in-depth studies of RFE/RL language services and program series. Held discussions with the BIB members regarding the results of these evaluations.

Select and supervise outside program evaluations but not on a regular and systematic basis. Results are provided to the BIB, but no formal discussions are held with the BIB.

Organized a special program review conference with BIB, executive branch, and congressional personnel.

No program review conferences have been held. The BIB chairman has organized some lectures but only for RFE/RL personnel.

The staff's primary activity continues to be the review of program scripts for policy compliance. However, one staff member said he stopped sending information on violations to the BIB because he was criticized for documenting violations. Additionally, the staff no longer regularly attends and participates in BIB oversight meetings. Before 1982, the staff attended these sessions. However, the executive director of the BIB

staff told us that the current BIB decided that there was no benefit to having staff at these meetings.

According to one staff member, some BIB members are very active and this may explain why less emphasis has been placed on the staff's services. As stated in the conference report, it was expected that as a part-time board, the members would not work more than 30 to 45 days a year. We found that the BIB chairman worked about two to three times that amount. For example, during the first 10 months of fiscal year 1984, the chairman worked 171 days out of a possible 211, and a total of 785 hours for an average of 4.6 hours for each day worked. The chairman's time records showed a similar pattern for fiscal years 1982 and 1983. The time charged by the remaining BIB members for fiscal year 1984 varied widely, ranging from 8 hours to 306 hours, and as few as 4 days to as many as 100 days.

In materials provided in response to our draft report, BIB officials listed a number of activities being performed by BIB staff and disagreed that staff was not used effectively. Our information and conclusions were based on extensive interviews with the staff and comparisons of previous and current activities. We did not intend to imply that there was no contact between the BIB and staff, but rather to indicate that contact had decreased and the staff was not being used as extensively in program oversight as in the past.

OVERSIGHT COULD BE ENHANCED BY  
FEEDBACK FROM THE DEPARTMENT  
OF STATE

The BIB could obtain valuable information about the radios' programming through feedback from outside sources, including the Department of State, academic specialists, and emigre organizations. Of these, the State Department--with its foreign service posts, its knowledge of and contacts with the radios' audiences, and its responsibility for carrying out U.S. foreign policy--is in an unequalled position to provide the BIB with feedback important to its oversight role. Yet the foreign service posts have provided little feedback for the last several years, and coordination between the Department of State and the BIB has been limited.

State has provided  
little feedback

The Secretary of State is required by law to assist the BIB by providing it with U.S. foreign policy information. In the past, some foreign service posts provided feedback to help determine whether RFE/RL programs were consistent with foreign policy objectives and to evaluate program quality and signal reception in the target area. This practice had fallen off in recent years.



In December 1983 and again in May 1984, the Department of State directed foreign service posts in Eastern Europe and the Soviet Union to provide monthly monitoring reports on RFE/RL broadcasts. The reports were to cover three areas--signal monitoring, suggestions for topics to be covered by broadcasts in their country, and reactions to specific broadcasts. In addition to the State Department directives, the president of RFE/RL sent a letter in July 1984 to the U.S. ambassadors of each country in the broadcast areas asking for assistance in monitoring and evaluating RFE/RL's broadcasts.

Our review of cable traffic from the posts and discussions with the State officials disclosed that despite the Department's direction, post reports have been spotty. For example, between December 1983 and August 1984, eight reports were received from the posts, including four from Sofia, Bulgaria, three from Prague, Czechoslovakia, and one from Kabul, Afghanistan. According to State officials, the posts have stated that they do not have the time, resources, or in some cases the language capabilities to monitor RFE/RL broadcasts. State officials in Washington said that it may also be a matter of what priority the ambassadors give the requirement to provide monthly monitoring reports.

#### Coordination between BIB and State has decreased

According to several State officials, coordination between the Department and BIB has declined in recent years. BIB staff said that they previously visited U.S. missions in Eastern Europe and the Soviet Union to discuss the impact of RFE/RL programs in the receiving country, and worked with State in arranging for U.S. missions to review RFE/RL program content and technical effectiveness. The staff told us they no longer perform these tasks.

The Under Secretary of State for Political Affairs raised the coordination issue in an August 17, 1984, letter to the BIB chairman. The letter's primary purpose was to notify the BIB about an RFE broadcast that was inconsistent with U.S. foreign policy. The Under Secretary also stated in the letter that:

"Instances such as this one only confirm our feeling that it would be useful to strengthen the Department's coordination with the Board so that the radios are broadcasting views which are not inconsistent with U.S. foreign policy."

The Department of State is not represented on the BIB or at its meetings, even though the meetings were closed to the public for the stated reason that they regularly included discussions relating to sensitive U.S. foreign policy issues.

BIB AND RFE/RL SHOULD  
COORDINATE EVALUATION EFFORTS

The BIB and RFE/RL periodically commission academic specialists and others to review RFE/RL programming. The evaluations normally cover one week of programming. We found that these program evaluations were not being coordinated between BIB and RFE/RL. Many broadcast services have not been evaluated by either, while two services have received duplicative evaluations.

Since 1980, most RFE/RL broadcast services have not been subject to outside program evaluations. For example, from January 1981 through 1983, no program evaluations were made on 13 of the 20 RFE/RL broadcast services, and during the same period 4 of the broadcast services were reviewed only once. In 1984, the BIB staff and RFE/RL together commissioned 18 outside broadcast service evaluations. Because the two organizations acted independently some services were evaluated twice. For example, in 1984 the BIB staff and RFE/RL each commissioned an evaluation for RFE's Czechoslovakian and Romanian services.

The outside evaluations done since 1980 showed a mix of positive and negative comments covering such things as policy compliance, language pronunciation, tone and voice, and length of programs. BIB and RFE/RL officials agreed that these evaluations were useful and should be continued.

The BIB staff and RFE/RL recognized the need to coordinate outside evaluations. However, there was no formal mechanism to assure this. RFE/RL plans to commission outside evaluations for each language service every other year. The BIB staff previously developed tentative evaluation schedules for 2 years in advance, but now the BIB staff commissions an outside evaluation when it sees a need and funds are available.

Another area where coordination between the BIB and RFE/RL would enhance BIB oversight involves potential violations identified by BAD. Although BAD reviews programs for policy compliance, it does not provide its evaluation reports to the BIB. This is contrary to the BIB regulations which require RFE/RL management to promptly inform BIB of any violations of the policy guidelines and to share any RFE/RL evaluation of the violations.

CONCLUSIONS

Because of the lack of documentation, we could not determine the extent to which the BIB is involved in program oversight. Certain factors, however, indicate that BIB's independent oversight has decreased. Distinctions between BIB members' corporate and oversight responsibilities are blurred; the members appear to be concentrating on their corporate

responsibilities; and the BIB staff--a key resource in performing independent program oversight--is not being used effectively. Further, regulations governing certain exchanges of information between the BIB and RFE/RL are not being followed, and the BIB is not always aware of information which could facilitate its oversight.

The BIB needs to define its program oversight goals, provide appropriate guidance to its staff, and revise its regulations to reflect changes resulting from the Pell amendment. The BIB especially needs to address the issue of how the BIB staff is to be used. Without doing so, the need to maintain such senior staff is questionable.

BIB oversight would benefit from increased input from outside sources. Closer coordination between BIB and the Department of State is needed. The foreign service posts located in the radios' broadcast area provide a unique opportunity for the foreign affairs community to evaluate and critique RFE/RL programming.

## RECOMMENDATIONS

### Recommendations to the BIB

To strengthen the federal oversight activities, we recommend that the Chairman of the BIB, working with the Board members:

- d --Define BIB's program oversight goals and revise regulations governing these and other activities.
- ^ --Determine and clarify the role of the BIB staff in fulfilling the federal oversight responsibility. As part of this responsibility, the BIB should consider establishing a formal system to review, evaluate and, when appropriate, respond to all reported broadcast violations or questions regarding broadcast practices.
- " --Instruct RFE/RL management to promptly inform the BIB of any reported violations of the policy guidelines and of any corrective actions taken.
- " --Develop an annual plan which incorporates the needs of both the BIB and RFE/RL when using outside consultants to evaluate RFE/RL broadcast services.
- r --Instruct the BIB staff to increase coordination with State Department desk officers for those countries receiving RFE/RL broadcasts.

13 --Invite the Department of State periodically to send a representative to BIB meetings to provide the Departments perspective on programming issues.

#### BIB comments

The BIB member tasked with providing comments on our draft to the Chairman of the Senate Foreign Relations Committee took exception to our finding that BIB staff were not used effectively. He stated that the BIB used the staff extensively, and staff has continued to perform oversight functions as in the past. He noted, however, that all our recommendations either have been or will be fully addressed.

#### Recommendation to the Secretary of State

14 We recommend that the Secretary of State reemphasize the important role the foreign service posts can play in providing feedback on RFE/RL broadcasts and provide post input to the BIB for use in its oversight responsibilities.

#### Department of State comments

The Department of State, in commenting on a draft of this report, concurred in our recommendation to increase contact between the Department and BIB. State believes that "a structural consultative relationship. . . is necessary to insure that RFE/RL broadcasts are not inconsistent with our broad foreign policy objectives." In this regard, the Department stated that our recommendation that the Board periodically invite a State representative to its meetings would be a positive development. The Department said also that, since we completed our fieldwork, it had reemphasized to the posts the importance of participating in RFE/RL monitoring activities and had given them detailed instructions on monitoring requirements. The Department stated that it had started to receive semimonthly reports from all posts as their resources and ability to hear the broadcasts permitted.

CHARLES H. PERCY, ILL., CHAIRMAN

HOWARD H. BAKER, JR., TENN.  
 JESSE HELMS, N.C.  
 RICHARD G. LUGAR, IND.  
 CHARLES McC. MATHIAS, JR., MD.  
 NANCY L. KASSEBAUM, KANS.  
 RUDY BOSCHWITZ, MINN.  
 LARRY PRESSLER, S. DAK.  
 FRANK H. MURKOWSKI, ALASKA  
 PAULA HAWKINS, FLA.

CLAIBORNE PELL, R.I.  
 JOSEPH R. BIDEN, JR., DEL.  
 JOHN GLENN, OHIO  
 PAUL S. SARBANES, MD.  
 EDWARD ZORINSKY, NEBR.  
 PAUL E. TSONGAS, MASS.  
 ALAN CRANSTON, CALIF.  
 CHRISTOPHER J. DODD, CONN.

# United States Senate

COMMITTEE ON FOREIGN RELATIONS

WASHINGTON, D.C. 20510

February 27, 1984

SCOTT COMEN, STAFF DIRECTOR  
 GERYLD B. CHRISTIANSON, MINORITY STAFF DIRECTOR

The Honorable  
 Charles A. Bowsher  
 Comptroller General of the  
 United States  
 General Accounting Office Bldg.  
 441 G Street, NW  
 Washington, DC 20548

Dear Mr. Bowsher:

Under my amendment to PL 97-241, the Board for International Broadcasting (BIB) was given increased authority over Radio Free Europe/Radio Liberty (RFE/RL). My amendment was intended, in part, to improve the radios' compliance with established program policy guidelines. Reports of continuing problems in ensuring such compliance have, however, arisen.

Last December, Mr. Geryld B. Christianson, the Minority Staff Director of the Senate Foreign Relations Committee, visited RFE/RL to look into these reports. He concluded that problems exist and that a number of changes made by RFE/RL's new management increased the potential for an increase in broadcast violations.

Since Mr. Christianson's visit was brief, his conclusions were necessarily tentative, but they clearly indicated the need for further study. I would, therefore, appreciate it if the GAO would evaluate RFE/RL's broadcast control procedures and review the oversight role of the BIB and its staff. Since Mr. Christianson has already done some work on this matter, you might find the enclosed copy of his report to be useful. He will also be available to consult with your staff on the specific issues to be addressed in your study.

With every good wish.

Ever sincerely,

  
 Claiborne Pell

Enclosure

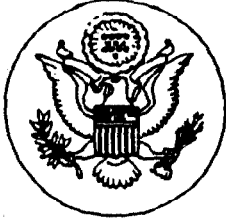
(GAO Note: Enclosure not included.)

MEMBERS OF THE BOARD FOR  
INTERNATIONAL BROADCASTING<sup>1</sup>

| <u>MEMBER</u>                | <u>TERM<br/>EXPIRES</u> |
|------------------------------|-------------------------|
| Clair W. Burgener            | 4/28/85                 |
| Malcolm S. Forbes, Jr.       | 4/28/86                 |
| Joseph L. Kirkland           | 4/28/84 <sup>2</sup>    |
| Arch L. Madsen               | 4/28/84 <sup>2</sup>    |
| James A. Michener            | 4/28/84 <sup>2</sup>    |
| Edward N. Ney                | 4/28/85                 |
| Michael J. Novak, Jr.        | 4/28/85                 |
| Frank Shakespeare (Chairman) | 5/20/86                 |
| Ben J. Wattenberg            | 4/28/86                 |

<sup>1</sup> These same nine members of the Board for International Broadcasting also serve as the board of directors of RFE/RL, Inc.

<sup>2</sup> Term expired but the member continues to serve until either reappointed or replaced.



**BOARD FOR INTERNATIONAL BROADCASTING**  
United States of America

Suite 400  
1201 Connecticut Avenue, N.W.  
Washington, D.C. 20036  
(202) 254-8040

**RECEIVED**

APR 30 1985

April 29, 1985

Mr. John Payne  
General Accounting Office  
Audit Site  
Room 2536A  
Department of State  
Washington, D. C. 20520

Dear Mr. Payne:

Enclosed please find BIB's and RFE/RL's comments on the GAO Report.

Sincerely yours,

*Frank Shakespeare*  
Frank Shakespeare  
Chairman

GAO Note:

Accompanying this letter were six documents which dealt directly or indirectly with the report. They included (1) a BIB member's comments on the draft report to the Chairman of the Senate Foreign Relations Committee, (2) an internal memorandum from the Special Assistant to the president of RFE/RL concerning the draft report, and (3) other internal memoranda addressing issues discussed in the report. We considered all this information and incorporated changes, as we felt appropriate, in the final report.

*Comptroller**Washington, D.C. 20520*

April 15, 1985

Dear Frank:

I am replying to your letter of March 22, 1985 to the Secretary which forwarded copies of the draft report: "Improved Oversight Can Reduce Broadcast Violations at Radio Free Europe/Radio Liberty".

The enclosed comments on this report were prepared in the Bureau of European and Canadian Affairs.

We appreciate having had the opportunity to review and comment on the draft report. If I may be of further assistance, I trust you will let me know.

Sincerely,

A handwritten signature in cursive script, appearing to read "Roger".

Roger B. Feldman

Enclosure:

As stated.

Mr. Frank C. Conahan,  
Director,  
National Security and  
International Affairs Division,  
U.S. General Accounting Office,  
Washington, D.C. 20548



GAO Draft Report: Improved Oversight Can Reduce Broadcast  
Violations at Radio Free Europe/Radio Liberty

The Department of State has studied the draft recommendations regarding better coordination within RFE/RL and between the radios and the Board for International Broadcasting and believe them to be useful.

On page 46, the draft report specifically recommends that the Secretary of State "reemphasize the important role the Foreign Service posts can play in providing feedback on RFE/RL broadcasts and provide post input to the BIB for use in its oversight responsibilities". This recommendation has already been substantially met in a message sent by Under Secretary Armacost on February 1, 1985 to all posts in the RFE/RL target area. The message reemphasized the importance of our posts' participation in RFE/RL monitoring activities, and issued detailed instructions as to how this program was to be carried out. Since that time, all our posts have begun to send in semi-monthly reports covering both the RFE/RL signal, and the substance of broadcasts, insofar as their resources and ability to hear the signal through jamming permit. We hope the final GAO report will note this development.

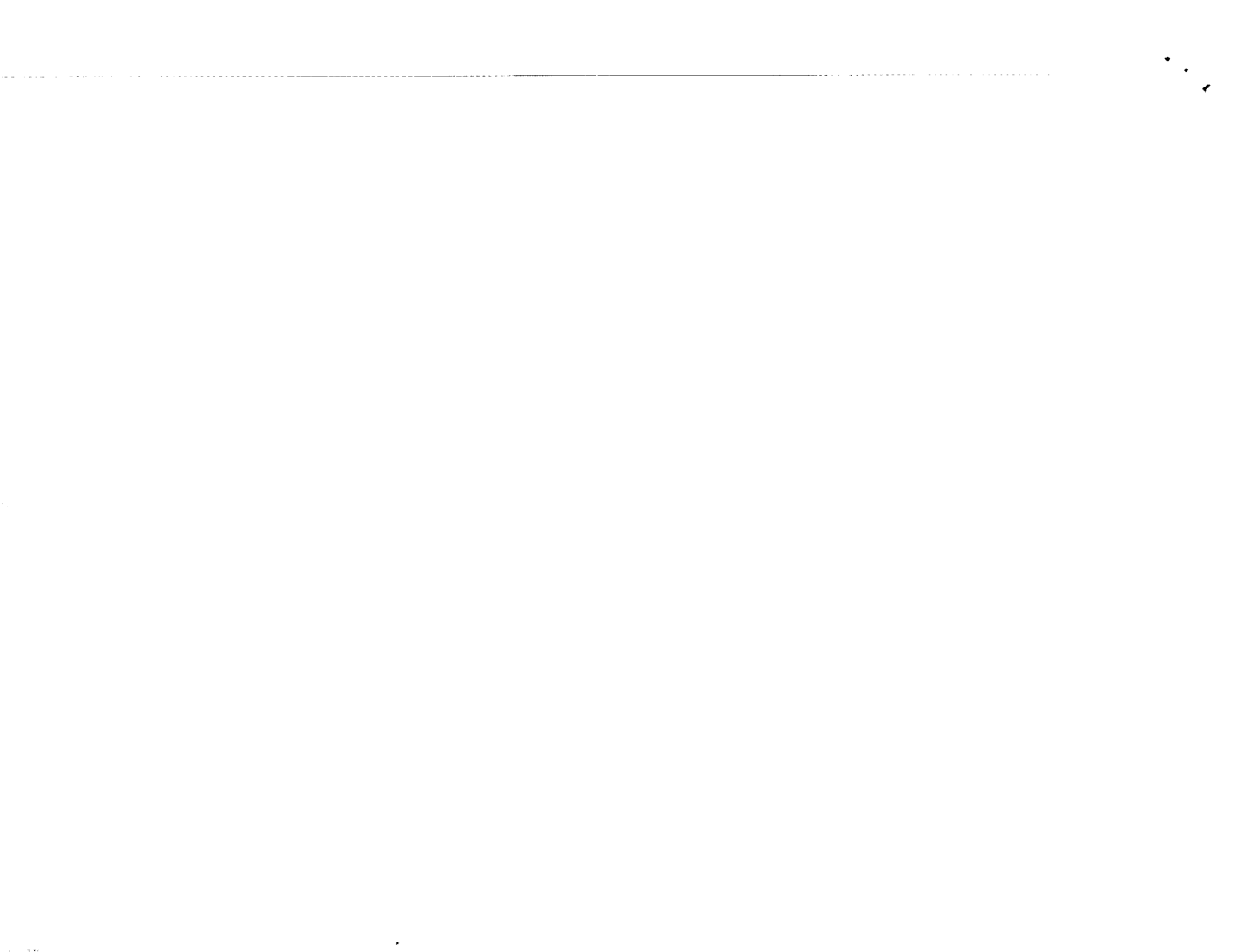
The Department warmly supports the principle of closer interaction with the Board and its staff. We believe it would be useful for the Board to gain a better understanding of U.S. foreign policy objectives from appropriate Department officials. A structural consultative relationship between the Department and the Board is necessary to insure that RFE/RL broadcasts are "not inconsistent" with our broad foreign policy objectives.

In this regard, we believe that the report's recommendation for periodic invitations to be extended to the Department to send a representative to Board meetings would be a positive development. It would provide the opportunity for the Department to acquaint the Board with our foreign policy objectives in the broadcast target area, as well as with other foreign policy matters as might be appropriate. It would not be a substitute, however, for day-to-day dialogue when we might review programming and point out instances where, in the Department's view, broadcasts appear inconsistent with U.S. foreign policy objectives. At the same time, we believe it is essential that the function of the Munich Consulate General liaison officer with the radios be strengthened by providing this officer ready access to top management in RFE/RL so that he can provide advice as appropriate on policy matters and acquaint radio management with foreign policy considerations of which they might otherwise be unaware.



Mark Palmer  
Deputy Assistant Secretary  
for European Affairs





31550.

**AN EQUAL OPPORTUNITY EMPLOYER**

UNITED STATES  
GENERAL ACCOUNTING OFFICE  
WASHINGTON, D.C. 20548

---

OFFICIAL BUSINESS  
PENALTY FOR PRIVATE USE \$300

**BULK RATE  
POSTAGE & FEES PAID  
GAO  
PERMIT No. G100**

