Children’s Educational Television Regulations and the Local Broadcaster: Impact and Implementation

A study conducted by Amy B. Jordan (Ph.D., University of Pennsylvania, 1990) and John L. Sullivan (Ph.D. candidate, University of Pennsylvania) for the Annenberg Public Policy Center of the University of Pennsylvania under the direction of Kathleen Hall Jamieson.

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The Annenberg Public Policy Center  
3620 Walnut Street  
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Foreword

The Annenberg Public Policy Center was established by publisher and philanthropist Walter Annenberg in 1994 to create a community of scholars within the University of Pennsylvania which would address public policy issues at the local, state and federal levels. Consistent with the mission of the Annenberg School for Communication, the Center has four ongoing foci: Information and Society; Media and the Developing Mind; Media and the Dialogue of Democracy; and Health Communication. Each year, as well, a special area of scholarly and social interest is addressed. The Center supports research and sponsors lectures and conferences in these areas. This series of publications disseminates the work of the Center.

Kathleen Hall Jamieson
Director
Summary

This study was designed to assess the impact of the new Federal Communications Commission regulations involving educational programs for children on the current activities and future intentions of a representative sample of local broadcasters. In open-ended interviews with representatives from 28 stations around the country we explored local broadcasters’ familiarity with the new regulations; current and planned efforts to provide educational programming; intended and unintended consequences of the regulations for local broadcasters; and implications of these findings for public policy.

Some of the highlights of this report are:

- **Local broadcasters are, on the whole, familiar with the FCC’s new reporting and programming requirements.** The aspects of the regulations that were most understood involve the “three-hour rule” and on-air identification of educational programming. There were, however, several misconceptions about restrictions on when such programs can air (some mistakenly believed the upper limit to be 5:00 p.m. or midnight) and about restrictions on commercials during these programs.

- **Local broadcasters intend to comply with the three-hour rule and have made plans to air the three hours within the allowable time frame (7:00 a.m. to 10:00 p.m.).** Several respondents were concerned about how to deal with preemptions by sports programming (particularly a concern for West Coast affiliates) and the intense competition to attract and keep a child audience during the popular Saturday morning hours.

- **Non-affiliated local broadcasters will get their programs from a variety of sources; network affiliates will almost exclusively air network-provided educational fare in the 1997/98 season.** This represents a departure from the current practice of using a mix of network and syndicated programming to fulfill children’s programming requirements. An Annenberg Public Policy Center content analysis of networks’ 1996 educational offerings indicates that they are educationally weaker than syndicated programs. Moreover, many of the respondents in this study said that they would stop producing their local programs, since they needed to make room for network-provided programs.

- **Network affiliates will actually decrease the amount of children’s programming they offer, while “weblets” (UPN and WB affiliates) and independents will slightly increase their educational offerings.** Because the major four networks will be providing the suggested minimum three hours of educational programming to their affiliates, affiliates will be dropping their syndicated or local programming, resulting in fewer programs for children. In addition, the very early morning hours (5 a.m. to 7 a.m.) will no longer be filled with children’s educational programming because these hours now fall outside the allowable time frame for children’s programs. However, the amount of educational programming on independent and “weblet” programming will increase.
stations will increase slightly beginning in the Fall of 1997, possibly because of the greater supply of these shows currently on the syndication market.

- **Local broadcasters intend to comply with the FCC's reporting requirements.** All say they currently identify their educational programs with on-air identifiers (usually an E/I symbol) and in material they send to TV Guide and the local newspaper. An Annenberg Public Policy Center survey found, however, that only two percent of parents recognized the meaning of the E/I symbol. In addition, according to an APPC content analysis of newspaper coverage of children's television, very few newspapers carry the broadcasters' E/I labels.

- **Local broadcasters believe that their communities do not care about their children's educational programming efforts.** They cite low ratings and lack of feedback as evidence for this belief. An APPC survey indicates, however, that parents do care about what their children watch (nearly three quarters said they were concerned about the content of children's programs). It is possible that parents are simply confused about the new regulations and unsure how to provide feedback.

The study therefore points to a number of efforts that can be made to increase the viewership and profitability of children's educational programming: developing (in collaboration with the networks) education and outreach programs for the local broadcasters' audiences; cultivating advertisers by highlighting the benefits of association with educational programs; soliciting community input rather than relying on viewer-generated feedback; and involving other media (e.g., newspapers) in providing parents and children with the information they need to make positive viewing decisions.
Introduction

Background

On August 8, 1996, the Federal Communications Commission unanimously passed regulations designed to put “teeth” into the Children’s Television Act (CTA) of 1990, which Congress had passed in order to increase the availability of educational children’s television. Beginning January 2, 1997, commercial broadcasters must identify, on the air and in printed listings, their educational programs for children age 16 and under. Beginning in September, 1997, broadcasters who wish to have their license renewal applications expedited must begin airing three hours of core educational programming each week. “Core educational” programs are defined as those that have education as a significant purpose, air between 7:00 a.m. and 10:00 p.m., are regularly scheduled, and are at least 30 minutes long. Broadcasters may air somewhat less than three hours of such programming (though they will then be subject to a more extensive application review) if they demonstrate that they are serving the child audience in other ways (FCC, 1996).

The new regulations are a significant departure from previous CTA requirements, which offered a less rigid definition of “educational/informational programming.” As a result, some broadcasters used questionable programs to satisfy those requirements. In one well-known example, “The Jetsons” was cited as an educational program that teaches children about “what life will be like in the 21st century” (Kunkel and Canepa, 1994). While the revised definition of educational programming still allows for both traditional academic and prosocial programs, it now requires that programs be “specifically designed for children” with “education as a significant purpose”—two definitional components that would disqualify a program such as “The Jetsons.”

The CTA originally contained no guidelines as to the amount of programming broadcasters needed to air in order satisfy the FCC. Some broadcast markets aired an average of four hours a week of educational programs, while others aired as few as two (Kunkel and Canepa, 1994). Moreover, programs were often aired at times that made them vulnerable to preemption by sporting events. One educational program, “Beakman’s World,” was preempted so much that its creators feared viewers would give up on trying to find the program (Keller, 1996). The FCC’s new guidelines do not allow frequent preemption of core programs and require stations to air a preempted program at another time during that week.

Finally, the 1997 requirements require broadcasters to air programs at times when children are actually awake and potentially in the audience—between 7:00 a.m. and 10:00 p.m. Previous studies indicate that educational programs have often been aired before sunrise (with a typical start time as early as 5:00 a.m.) (Jordan, 1996). Programs will not count toward the three required hours unless they begin after 7:00 a.m.
The regulations are designed to increase the amount of educational programming available to children over the commercial broadcast airwaves and to raise awareness among viewers of the broadcasters' efforts to provide programs for children. Reporting requirements that went into effect at the beginning of 1997 are already producing results: educational icons air at the beginning of programs alongside the ratings,1 and E/I symbols (for “educational/informational”) have begun to appear in newspapers and TV Guide. Programming requirements have also increased pressure on networks, many of which have agreed to provide some, if not all, of the three hours of educational programs to their affiliates. Networks' educational efforts have received intense scrutiny by researchers, the press, and advocates. It remains to be seen whether the networks' proposed 1997/98 lineups will live up to the spirit and the letter of the FCC regulations for children’s educational programs.

**FCC regulations and the local broadcaster**

Overshadowed in the debate over the implementation and implications of the FCC’s regulations regarding children's television is the role of the local broadcaster. A commercial broadcaster receives a license by agreeing to “serve the public interest, convenience, and necessity” (FCC, 1984). It is the local commercial broadcaster, not the network, that receives the license. In order to renew its license every seven years, each broadcaster must provide evidence that it has fulfilled its public interest obligations.2 Putting its FCC license at risk could jeopardize the existence of the local station.

Implementation of FCC regulations therefore occurs at the local level. If it is an affiliated station, the local broadcaster relies on the network to provide the majority of core educational programs — but takes a leap of faith in doing so, trusting that the provided programs are truly educational. In addition, the local broadcaster shoulders responsibility for informing the public about its educational fare, keeping a public file, and pulling together the license renewal application forms. Responsibility for providing educational children's programs to the public ultimately lies with the local broadcaster.

This study assesses the impact of the new FCC regulations on the current activities and future intentions of a representative sample of local broadcasters. The study coincides with the initial stages of the implementation of these regulations. In open-ended interviews with representatives from 28 stations around the country, we explored the following questions:

- How familiar are local broadcasters with the new regulations?
- What are broadcasters currently doing to serve the child audience and how, if at all, will these efforts change as a result of the new regulations?

---

1 Although the icons exist, they may be less than helpful to viewers. Most air for less than five seconds. Moreover, each network has its own unique (and sometimes obscure) symbol. NBC, for example, uses a bald head with glasses that opens up to reveal an E/I. ABC uses a lightbulb with a voice-over that says, “illuminating programming.”

2 In cases where the local broadcaster is owned and operated by a network, the network does hold the license and files the renewal application.
Who will provide the three hours of programming for affiliates and independent stations, and how are these programs selected?

How will the requirements affect scheduling practices?

What are the overall consequences (intended and unintended) of the regulations for the local broadcasters?

In answering these questions, we explore local broadcasters’ current practices and future efforts. We conclude by recommending ways in which regulatory efforts might be more effectively implemented at the local level.
Methodology

The local television stations were chosen using a purposive sampling technique in order to obtain a representative sample across market size, geographic area, and station affiliation. First, we used Nielsen Media Research figures for Designated Market Area (DMA) sizes as reported in the Broadcasting & Cable Yearbook 1996 to estimate the number of television households for each market. To obtain a representative sample of market sizes, we divided all DMAs in the United States into three size categories: large (the top ten U.S. markets), medium (from 1.58 million to 500,000 TV households per market), and small (under 500,000 TV households per market). The final sample consisted of stations from four different markets: one large, two medium, and one small (see Table 1).

To ensure geographic diversity in the sample, we chose one market each from the Northeast, South, Midwest, and West. Within each chosen market, we contacted every station listed in the Broadcasting & Cable Yearbook 1996 for an interview. Out of a total possible sample of 32 television stations, 28 were successfully surveyed for this study (representatives from three stations did not return phone calls, and one refused an interview), for a response rate of 87.5 percent. These 28 stations were also representative of all station affiliations, including the networks (NBC, ABC, CBS, Fox), the “weblets” or fledgling networks (UPN and WB), and independent stations (including religious and Home Shopping affiliates; see Table 2).

Table 1. Market sizes of sampled stations

<table>
<thead>
<tr>
<th>Market size</th>
<th>Number of stations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Large</td>
<td>12</td>
</tr>
<tr>
<td>Medium</td>
<td>12</td>
</tr>
<tr>
<td>Small</td>
<td>4</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>28</strong></td>
</tr>
</tbody>
</table>

Table 2. Network affiliations of stations in sample

<table>
<thead>
<tr>
<th>Network affiliation</th>
<th>Number of stations</th>
</tr>
</thead>
<tbody>
<tr>
<td>NBC</td>
<td>5</td>
</tr>
<tr>
<td>CBS</td>
<td>4</td>
</tr>
<tr>
<td>ABC</td>
<td>4</td>
</tr>
<tr>
<td>Fox</td>
<td>3</td>
</tr>
<tr>
<td>UPN</td>
<td>2</td>
</tr>
<tr>
<td>WB</td>
<td>2</td>
</tr>
<tr>
<td>Ind</td>
<td>8</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>28</strong></td>
</tr>
</tbody>
</table>

To select the respondent at each television station, the interviewer called the main station telephone number and asked for the person in charge of children's programming. While most requests were directed immediately to the programming director or programming coordinator, sometimes it was difficult to locate one individual who was responsible for children's programming at the station (or who felt comfortable responding to questions). In these cases, requests for information were referred as high as the general manager of the station. So, while most of the interview respondents were involved with programming (see Table 3), general managers and community affairs directors were also surveyed. Finally, of the
29 professionals interviewed for this study, 15 identified themselves as the children's television liaison for their station (see Table 3).³

<table>
<thead>
<tr>
<th>Job title</th>
<th>Number of respondents</th>
<th>Number of children's television liaisons</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program director</td>
<td>14</td>
<td>7</td>
</tr>
<tr>
<td>Programming (various)</td>
<td>6</td>
<td>4</td>
</tr>
<tr>
<td>General manager</td>
<td>5</td>
<td>1</td>
</tr>
<tr>
<td>Public/ Community affairs</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>Other/ Unknown</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>29</strong>*</td>
<td><strong>15</strong></td>
</tr>
</tbody>
</table>

³Although only 15 self-identified children's television liaisons were interviewed, as noted later, this does not mean that these stations had no identified person in this position.

Table 3: Job titles of respondents

The data consisted of responses to a series of open-ended questions about knowledge of the FCC regulations and the impact of these regulations on the business practices at the respondents' stations (see Appendix for a list of the interview questions).⁴ The interviews were conducted over the telephone over a seven-week period during February and March of 1997. Each averaged between 20 and 25 minutes in length. All tape-recorded interviews were transcribed for analysis.

What is a “local broadcaster”?

Understanding the impact of the new FCC regulations on local television broadcasters requires consideration of three distinct types of business arrangements in the television industry, all of which are called “local broadcasters”: owned and operated (O & O), network-affiliated, and independent stations. First, “owned and operated” stations are completely owned by their respective networks. The number of O & Os was limited in 1984 by the FCC, which ruled that networks could own a maximum of 12 stations and that the potential audience reached by these stations could not exceed 25 percent of U.S. television households (Reed and Reed, 1992, p. 555). However, the 1996 Telecommunications Act eliminated these restrictions on station ownership and increased potential audience reach allowance of these stations to 35

⁴Once the respondent agreed to the interview, a time was set for it. In general, however, most interviews took place immediately following the introduction of the project by the interviewer. The interviewer asked for permission to tape record the interview; only two of the respondents refused the request. Detailed notes were taken by the interviewer in these cases.

Although only 15 self-identified children's television liaisons were interviewed, as noted later, this does not mean that these stations had no identified person in this position.
percent of all U.S. television households (Telecommunications Act of 1996). Second, nearly 60 percent of all broadcast stations (as of 1992) are affiliated stations, which have contracts with major networks to typically receive more than 70 percent of their total programs from them (Reed and Reed, 1992, p. 15). Major networks provide the affiliates with programs at little or no cost in exchange for advertising time on the stations. Lastly, about 20 percent of U.S. television stations are independents. These stations have no affiliation with networks and instead buy their programming on the open market from syndicators, often with similar barter agreements for advertising time.

O&Os, affiliates, and independents are distinguished by the degree to which each station type can make autonomous decisions about its program selection and scheduling. O&Os are located in the largest television markets and therefore occupy a powerful position vis-à-vis advertisers and syndicators. The network itself is the primary decision-maker about programming selection and scheduling on these stations. Affiliates are semi-autonomous in the sense that they can be flexible in their scheduling and program selection while also honoring their network contractual obligations. The stations with the most autonomy are independents, which select and schedule programs without having to worry about obligations to a single programming source or network. In this report, both O&Os and affiliates will be referred to as “affiliates” because decisions regarding children’s educational programming are typically made at the network level.

Other key players in the commercial broadcasting system

Several other “key players” allow local broadcasters to conduct their business. Each has its own function and agenda:

- **Advertisers.** Both local and national advertisers play an integral role in all stages of the commercial broadcasting system. While national advertisers make deals with networks and syndicators to buy commercial time, local advertisers contract with broadcast independents, affiliates, and O&Os for access to their audiences.

- **Syndicators.** Syndicators are distributors of programming that (1) is not produced specifically for a single network (first-run syndication) or (2) is a rerun of existing or past network programming. Syndicators make the bulk of their profits from selling commercial time to national advertisers as part of barter agreements with the stations that broadcast their programs. However, according to one respondent, in order for a program to be interesting to national advertisers, it must have at least approximately 75 percent “clearance” (that is, must reach at least 75% of American TV households).

- **Networks.** The activities and decisions of networks are a vital part of the business operations of 80 percent of local commercial broadcasters. Through affiliation agreements, networks can have a profound impact on the programs that are broadcast on the local station and on the scheduling of those programs. Networks are also beneficial for local broadcasters because
they provide popular programs at little or no cost. This attracts large audiences, which in turn attract local advertisers.

- **Local community.** The parents, children, and local citizen groups who view the television programs broadcast by these stations can have an impact on programming through their direct (phone calls, letters, protests) and indirect (choosing to view a particular program) feedback.

- **Government regulators.** Regulations and oversight by government bodies such as Congress and the FCC can also affect the business operations of local broadcasters. The extent and type of this influence is investigated here.

As the analysis of the interviews will make clear, the interactions among these key players are important factors in determining the types of programs available to young viewers as well as when these programs are offered.
Results

Local broadcasters’ knowledge and understanding of the regulations

The extent of knowledge about the new regulations and the strategies for their implementation were the first important issues investigated in this research. Specifically, what are the most salient features of these FCC policies for the individuals responsible for children’s television at these local stations? To address this question, we asked the respondents whether they were aware of the new FCC regulations regarding children’s educational broadcasting and what they understood those requirements to be. Table 4 charts the percentage of respondents who mentioned each aspect of the regulations in response to these questions. A “mention” was counted if the respondent volunteered a particular policy element, not in response to more specific probes (which came later in the interview). Note here that these percentages reveal only the respondents’ understanding of policies, and not compliance (or intent to comply) with them.

Table 4: Respondents’ mentions of specific FCC regulations on children’s educational broadcasting

<table>
<thead>
<tr>
<th>FCC regulation</th>
<th>Percentage of total respondents (N=28)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minimum of three hours per week of educational programming</td>
<td>79%</td>
</tr>
<tr>
<td>Air time restrictions between 7 a.m. and 10 p.m.</td>
<td>57%</td>
</tr>
<tr>
<td>Responsibilities for FCC quarterly reports (listing contents of individual episodes, age-range appropriateness)</td>
<td>57%</td>
</tr>
<tr>
<td>On-air designation of educational programs with an “E/I” icon</td>
<td>54%</td>
</tr>
<tr>
<td>Distributing educational programming information to newspapers and TV listing services</td>
<td>46%</td>
</tr>
<tr>
<td>Limits on commercial time during children’s programming*</td>
<td>39%</td>
</tr>
<tr>
<td>Keeping a public file at the station with information about educational programming for children</td>
<td>21%</td>
</tr>
<tr>
<td>Confused new FCC regulations with MPAA content ratings</td>
<td>18%</td>
</tr>
</tbody>
</table>

* Part of the 1990 CTA but not of the most recent FCC regulations.

Not surprisingly, the most salient elements of the new regulations were those that were most straightforward in their implementation: three hours of educational children’s programs per week, broadcast at specific times, and designated with “E/I” icons. Mentioned only slightly less often was the requirement to distribute information about the E/I designation, content listings, and age-appropriateness to newspapers and television listing services. The relatively low number of respondents who mentioned the station’s public file (21%) suggests that more effort on behalf of station managers or industry groups (such as the National Association of Broadcasters [NAB]) may be needed to increase the salience of this aspect.
of the requirements. These respondents may be the first line of contact for parents and other interested viewers, so they need to be aware of the public file.

As Table 4 reveals, there were several misconceptions about the new regulations. First, while all of the respondents who mentioned the airtime restrictions for children’s educational programs could identify what time these restrictions start (7 a.m.), they often did not mention or were mistaken about the 10 p.m. upper time limit — responses ranged from 5 p.m. to midnight. This is probably due to the fact that, when it comes to children’s fare, mornings are the time of greatest concern to station programmers. In addition, 39 percent of the respondents mentioned limitations on commercial time during children’s programming, which was not an element of the latest FCC regulations but was instead part of the 1990 CTA. Another interesting misconception (among five of the respondents) was that the interview questions were about the recent Motion Picture Association of America-style content ratings for children’s television (TV-Y, TV-Y7, TV-PG, etc.). This misconception may reflect the degree of media attention given to the content ratings in recent months.

Local broadcasters’ implementation of the regulations

Our second focus was on the strategies with which local broadcasters intend to implement the new programming and reporting regulations: designating a children’s television liaison, compiling quarterly reports for the FCC, keeping a public file, and airing the required three hours of educational programming during the allowable time periods. Most local broadcasters felt that the impact of the new regulations on them would be minimal. However, as will become clear in a moment, the extent of the changes needed to meet the compliance standards varied across different station types and geographical regions.

Children’s television liaisons

One of the FCC regulations that went into effect in January, 1997 calls for each station to identify a children’s television liaison who will coordinate the filing of quarterly FCC reports, ensure that the station’s public file is complete, and answer questions about the station’s programming efforts. Of the 28 stations surveyed in this research, 20 reported that they had designated a current employee (or employees) to serve in the liaison capacity. The remaining eight were unfamiliar with the term and were uncertain about the purpose served by such a position. Those individuals primarily responsible for the liaison duties were program managers or program coordinators, although the stations that had public or community affairs personnel designated these individuals.

5 In addition, the nature of network affiliation contracts are such that preexisting prime-time schedules are generally set by the networks, with no children-oriented programming available during the 7 p.m. to 10 p.m. time period.
Almost all respondents indicated that the new requirements regarding quarterly reporting and public files would have little impact on them. Most saw these as simply another layer of paperwork that had to be completed. There were differences, however, in the attention that different types of stations gave to ensuring their compliance with the new reporting regulations. Several respondents from affiliate stations noted that their information about compliance procedures came from an NAB booklet outlining the regulations. At least two other affiliate stations went further. One respondent from an ABC affiliate boasted that the station's lawyers and an independent investigator had determined that the station was in full compliance:

> Just to get a head start on the whole thing, and then according to the specifics that the Commission released, copies went through our lawyers. We just wanted everything on January 2nd. In fact, we just had an in-house person that we hired to come through the station and check all of our FCC regulations, our technical, our public file, our issues list, and our children's programming. He gave us a blue ribbon, everything was fine.

A respondent from a network O & O indicated that the network’s law department ensured that the stations it owned were in full compliance with the letter of the law. He remarked, “there are a bunch of people in Washington, I don’t know exactly how many, whose job it is to make sure that we, as a network and as owned and operated stations, comply in every facet with the FCC’s regulations.” This legal attention was not mentioned by the respondents from independent stations, which suggests that they may not have a comparable level of legal expertise at their disposal.

Amount of educational programming

Although the FCC regulations do not require three hours of educational programming, all respondents stated that their stations would offer at least three hours by September of this year (and most said they were already in compliance). For the 20 respondents who were able to identify both the current and future (Fall) amount of children’s educational programming at their stations, an average was taken of these amounts for the basis of comparison (see Table 5). Although the majority of stations had already altered their program schedules to include three hours of educational programming (and planned to continue with three hours), there were subtle differences in the amount of this programming across the three station types. For instance, weblets offered on average the most educational programming, and the weblets and independents sampled also planned to slightly increase the amount of their educational offering beginning in the Fall of 1997.
**Table 5: Average amount of educational programming by station type**

<table>
<thead>
<tr>
<th>Station type</th>
<th>Average number of hours</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Networks</strong></td>
<td>February/March, 1997</td>
</tr>
<tr>
<td>(N=11)</td>
<td>3.6</td>
</tr>
<tr>
<td><strong>Weblets</strong></td>
<td></td>
</tr>
<tr>
<td>(N=3)</td>
<td>4.2</td>
</tr>
<tr>
<td><strong>Independents</strong></td>
<td></td>
</tr>
<tr>
<td>(N=6)</td>
<td>3.4</td>
</tr>
</tbody>
</table>

As Table 5 reveals, network O&Os and affiliated stations will be decreasing the number of hours they devote on average to children's educational programming. There are two explanations for this trend. First, each of the major networks will provide its stations with the mandated minimum three hours of educational programming in the Fall. Respondents at several of these stations stated that they would as a result cancel their existing syndicated or local programs, which would account for the decrease shown in Table 5. Second, several respondents stated that because there were no benefits associated with exceeding the minimum three hours, there was no incentive for them to provide more. For example, one Fox program manager explained why he had decided to reduce the amount of his station's educational programming from 3.5 to 3 hours in the Fall:

“We had been overachieving the half hours just because we felt it was part of our responsibility to do so, but we found out in the subsequent rulings that have come down and the license renewals that have come past since this thing has happened, that stations don't necessarily get extra credit for doing it. So, you try to be a nice guy and essentially they say, “So?”

Thus, the effect of the new regulations on the amount of children's programming is mixed: While weblet and independent stations will increase the amount of educational programming on average, network O&Os and affiliate stations plan to support somewhat less of this programming beginning in September.

**Air times of educational programs**

Respondents were asked when they intended to air their educational programs in the Fall. Table 6 provides an example of the air times for Fall programs in a large market. The table indicates that the majority of network programs will air on Saturday (particularly in the morning). One exception is Fox, which will air one of its educational programs during its weekday strip. This continues the networks' tradition of concentrating their children's programming on Saturday morning. Weblets and independents, on the other hand, are much more likely to air their educational programs on weekday mornings.
Table 6: Percentage of total educational programs across days in a large market for Fall, 1997

<table>
<thead>
<tr>
<th>Station type</th>
<th>Weekdays</th>
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<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Morning</td>
<td>Afternoon</td>
<td>Saturday</td>
<td>Morning</td>
<td>Afternoon</td>
<td>Saturday</td>
<td>Morning</td>
</tr>
<tr>
<td></td>
<td>(7-12)</td>
<td>(12-4)</td>
<td>(7-12)</td>
<td>(12-4)</td>
<td>(7-12)</td>
<td>(12-4)</td>
<td>(7-12)</td>
</tr>
<tr>
<td>Networks</td>
<td>0%</td>
<td>7%</td>
<td>14%</td>
<td>8%</td>
<td>0%</td>
<td>0%</td>
<td>29%</td>
</tr>
<tr>
<td>Weblets</td>
<td>21%</td>
<td>0%</td>
<td>4%</td>
<td>1%</td>
<td>1%</td>
<td>0%</td>
<td>27%</td>
</tr>
<tr>
<td>Independents</td>
<td>14%</td>
<td>7%</td>
<td>10%</td>
<td>0%</td>
<td>11%</td>
<td>0%</td>
<td>42%</td>
</tr>
<tr>
<td>Total</td>
<td>35%</td>
<td>14%</td>
<td>28%</td>
<td>9%</td>
<td>12%</td>
<td>0%</td>
<td>98%*</td>
</tr>
</tbody>
</table>

*Total number of hours of educational programming = 35.5.

While one of the goals of this research is to outline the ways in which local broadcasters intend to comply with the FCC regulations (as discussed earlier), it is also important to understand how, in the absence of an explicit definition of “educational,” local broadcasters select programming that fits the requirements. This section will outline the factors and constraints that shape the types of programming available to children. It will also outline how the new regulations fit within the long-established business structures that guide choices and decision-making at these local television stations.

Local program directors build their broadcast schedule from three types of television programs: network, syndicated, and locally produced. Network programs are either produced or bartered in syndication by the network itself (and not the local broadcaster), and are typically transmitted to the local broadcaster via satellite feed. In contrast, syndicated programs are created by independent producers and are bought by the local broadcaster directly from syndicators, usually in a 50/50 barter agreement in exchange for advertising time. Purchasing syndicated programs is a relatively inexpensive way for local stations to fill their schedules. Finally, locally produced programs are created by employees of a local station for its own broadcast. Because both pre- and post-production costs are carried by the local broadcaster alone, this type of programming is the most expensive.

Selecting educational programs

The new requirements regarding educational programming provide a somewhat broad and nebulous definition of “educational.” As a result, acquiring such programming calls for a variety of strategies. When asked how they selected programming that met the FCC requirements, these local broadcasters mentioned four things: trusting the syndicator, looking for a “seal of approval” from independent groups, trusting the networks, and using their own judgment.

6 Strategies were not mutually exclusive; many respondents used more than one at a time.
T rusting the syndicator

W hen asked how they decide whether or not a purchased program meets the FCC requirements, several respondents noted that they generally trusted the syndicators, who often gave assurances that the program was “pre-approved.” A s one program director at a WB affiliate noted, in cases where the program has not even been produced yet, local broadcasters rely on descriptions provided by the syndicators of the shows. Below are two examples from other respondents who mentioned this process of pre-approval:

W ell, usually they have been predetermined whether they fit the requirements before they get to me. It’s not something that I put a stamp of approval on. The FCC paperwork has to be filed proving that it meets these requirements, that there is certification of that....I mean a lot of times they’ll come with a certification paper that will say that this has been, has gotten the stamp of approval to meet the FCC stipulations. (Program manager, independent)

W e do it in concert with our L aw D epartment at N BC. T he stuff is cleared, strictly through our L egal S tandards D epartment in W ashington, D.C. T he staff works closely with the FCC, and with both the network and our owned and operated television stations, to make sure that every syndicator who provides programming for our air, that’s supposed to qualify, to the best of our ability we make sure that they do qualify. (Program manager, N BC affiliate)

P roducers may believe their programs are pre-approved because in the past they have been listed on FCC applications that have been successfully renewed. O r producers may be referring to the 1996 FCC regulations that list examples of acceptable core programs.

L ooking for a “seal of approval”

M any respondents said that they look for accreditation from various children’s advocacy groups or from academics as further proof that a program is educational for children. A s one general manager of a Fox station stated, “if a syndicator sells a show as FCC -friendly, they usually provide some type of information that will support that claim, whether it’s an endorsement from an organization or some other information to support that it is an FCC-friendly show.” Several types of accreditation were laid out in more detail by a program manager at an A BC affiliate:

W e look at the program very carefully, make sure that the syndicator provides us with the right written credentials and that they get the credentials from somewhere else other than them just making it up....L etters from the N EA, or letters from support groups, children’s support groups that say this is acceptable to the N ational E ducational A ssociation, or Peggy C harren is the producer [laughs], or whatever. W hatever it takes to get some credibility that’s beyond what the syndicator itself says.
The interviews made it clear that the syndicators were generally responsible for obtaining these accreditations in support of educational programs. Especially in larger markets, where syndicators face more competition for their product, this burden falls to them.

**T**r**u**sting the **n**et**w**orks

Among the respondents from stations affiliated with one of the four major networks (57% of the sample), none said that they second-guessed the network's decisions. In fact, many of these respondents said that they accepted the programs they received from their networks on faith as educational and informational for children. Said one respondent from an affiliate:

> The network just labels their program. They don't give us a reason of why they've labeled it. For example, they haven't told us why they've labeled “Winnie the Pooh” as educational/informational for ages 6 to 9. They just do that and we make the decision based on our watching the program and understanding what the criteria is for educational and informational. (Program director, ABC affiliate)

As this comment makes clear, it is unlikely that the network in this case has produced specific guidelines or a definition of educational programming for their affiliates. However, decisions to distribute educational programming to affiliates are not challenged at the local level.

**U**sing their own **j**udgment

Finally, when there was choice involved at the local level, regardless of the other strategies for program selection that respondents mentioned, almost all stated that they used their own judgment in deciding whether or not a particular program is educational. These judgments were made by viewing a pilot or written descriptions of the program before deciding to purchase it. Here were the responses of several individuals about their criteria for program selection:

> What we usually do is, have them give us a lengthy description of the program, episodes that they've known in the past, and coming up in the future, what they have scheduled for the season. Samples, you know, send us a demo tape of a show, or of some of the shows. That way, we have an understanding of what the content is, and we can determine whether this would be appropriate and would meet the requirements of the FCC. (Station manager, independent)

> I guess the best way to tell our children's programming is to sit down and look at it. If it's educational in some way to me, it's going to be educational for children...I think I would not pick up a show unless I saw it. (Programming coordinator, NBC affiliate)

As these and other comments illustrated, there was some concern with relying solely on the syndicator's assessment of a program's educational value. These concerns were more common at independent stations.
than affiliates, perhaps because an independent station generally did not have the recommendations of a network (or a network’s law department) to assist it in evaluating the educational value of particular programs. Several respondents also emphasized that the programs had to be “entertaining” as well as suitably “educational” in order for them to be viable.

Who is ultimately accountable?

The local broadcaster is ultimately responsible for airing programs that meet the FCC’s criteria. Because these criteria are broad and not clearly defined, these respondents employ the outlined strategies (which include simply accepting the network’s word) to help them decide what is “educational” and what is not. These interviews revealed the somewhat murky process of valuation and accreditation that accompanies the selection of these programs. Indeed, in the case of a bad decision made by a station programmer, no “failsafe” process will ensure that the inappropriate (that is, educationally weak) program will not find its way onto the broadcast schedule.

Scheduling educational programs

Beginning in September, 1997, “core” educational programming must be regularly scheduled, not preemptable, and aired between the hours of 7 a.m. and 10 p.m. The justification for such regulations lies in the fact that many of the broadcasters’ educational programs have been aired at times when few children are in the audience or when the programs were vulnerable to replacement by sports programming. When asked about current and future scheduling of educational programs, respondents brought up a number of issues that indicate scheduling may become difficult.

The issue of preemption

For many broadcasters, airing educational programs within the FCC’s post 7:00 a.m. time frame means finding time on Saturday mornings. But weekend airing often presents conflicts between children’s educational programming and sports programming. Since many broadcasters have commitments to broadcast tennis, auto racing, football, or college basketball, they worry that they may have to preempt their children’s programs. Strictly speaking, core programs cannot be preempted. Some respondents, however, felt that exceptions should be made. One respondent from an NBC affiliate said:

I know one of the sister stations asked one of the Commissioners: “What about sports? How many times are we going to be able to preempt a kids’ show and have it still considered a core program?” I think they said something like three times or something like that. That’s going to be very, very difficult. They don’t seem to be very flexible in terms of being able to preempt for something you have no control over.
The issue of preemption for sports programming is especially important for broadcasters on Pacific Time. Time differences between the East and West Coasts mean that many Pacific Time sports contests begin as early as 9:00 a.m. Such scheduling may put their children's educational programs in jeopardy.

The issue of attracting children

Most commercial broadcasters do not build their identity on their children's programming. One exception, of course, is Fox, which established its reputation and its revenue base as the “Fox Kids Network.” Independents are also likely to find their strength in children's programs, since they often look to fill an underserved niche by targeting the child audience. Affiliates of “the big three,” however, are much more likely to define themselves through their local news programs and on the strength of their network's adult programs, even for weekend programming.

Although most of the network affiliates' children's programs are concentrated on Saturday morning, the networks and local broadcasters have, in the last several years, cut back on the number of hours of children's programs. In 1994, NBC began programming exclusively for teens. And in 1997, CBS announced that it would eliminate all children's programs except those the FCC required. Fox, as well as Nickelodeon, Disney, and other cable channels, has made such significant inroads into the networks' child audience ratings that the networks have nearly abandoned the effort to woo children back. Instead, networks and their local affiliates have begun to program for adult audiences in what traditionally had been their children's time period. Cartoons have been replaced primarily with local or network news.

Said one respondent at an NBC affiliate:

For a station like a traditional affiliated station like ours, which is a lot of news and a lot of sports, [we] haven't historically done a lot of children's programming. How do we get noticed in that area? How do we make them notice, particularly when every station is marketing now?

Certainly this trend can present problems for programmers trying to find a home for their educational children's shows. It is difficult to create an awareness of children's TV offerings when only a few hours are aired. It is also difficult to create audience “flow” when cartoons are sandwiched between local and network news and talk shows. A s one respondent of an NBC affiliate pointed out:

Well, we don't have a great deal of flexibility. It's not really the best situation to have children's programming coming out of "Meet the Press" but that's what NBC has on Sunday morning from 9:00 to 10:00. And again, 6:00 to 8:00 a.m. we're doing local news so there's not an opportunity to put it on that early in the morning. The news department is not terribly thrilled to have kids' programming as a lead-in to their news, but that's the only way we can get it all in. Luckily, with NBC we have things like "NBA Inside Stuff" and that's actually what we put till late into our news because, you know, that seemed to make more sense than "Saved by the Bell."
The issue of competition

Broadcasters also worry about competition in an increasingly crowded field. Many respondents believe that children's programs (particularly children's educational programs) will cluster together. One respondent from an NBC affiliate said:

Now there's going to be all these other children's programs back-to-back, we're going to have to all air it in a certain window. The numbers are going to be lower for those programs. Lower than they ever were...are now. Is it going to bring even more kids to the table? I don't know. I'd be surprised.

Although educational programs in theory can be aired Monday through Sunday, 7:00 a.m. to 10:00 p.m., as a practical matter the majority of local network affiliates schedule such programming on weekend mornings, typically Saturdays. Because, as noted earlier, the affiliates of the “big three” do not see their primary audience as consisting of children, they like to keep children's programs separate from the general and adult ones. Affiliates also take their programming from the network, which schedules them in those traditional Saturday morning hours. The result is a concern that there will be too much competition for too few child viewers.

There are, however, broadcasters who counter-program. Fox, for example, airs much of its educational programming in its weekday strip at a time when competition for child viewers is limited and programming alternatives are mainly adult fare (e.g., “Oprah Winfrey” or news). Some station managers, particularly at independents and smaller networks that are not tied to a weekend schedule, look for a niche that is not already filled. One independent broadcaster said:

I'm trying to counter-program and run shows a little later than early morning because it's really difficult for me to compete against the networks and even the other stations in the market that have kids behind them. I try to...move it later so it won't go up against the four other stations that are running kids' stuff within that time.
Implications for public policy

It is important to obtain an early view of the local broadcasters’ efforts and intentions regarding the FCC’s regulations for children’s educational television in order to develop recommendations for effective implementation. Admittedly, assessing the overall impact of the regulations before the 1997/98 season may be a bit premature, since most of the programming requirements do not go into effect until September, 1997 (and the data for this report were collected in February and March of 1997). Many respondents, when asked what effect they expected the new programming and reporting requirements to have on their station, felt that it was “still too early to tell.” A few respondents even suggested that we re-interview them in six months, once they had had a chance to try out their ideas and strategies. However, it seems as though a number of potential consequences for the local broadcaster—both intended and unintended—could result from the FCC regulations. Such consequences need to be identified and may ultimately need to be addressed with either fine-tuning of the regulations or increased attention at the local level.

**Intended consequences**

Unsurprisingly, the 28 respondents interviewed for this study indicated that they will adhere to the FCC guidelines. The majority of the local broadcasters were already fulfilling their reporting requirements—rating programs, airing educational icons, and providing newspapers, grid services, and TV Guide with information about their ratings and educational programs. Many also seemed diligent about keeping a public file.

More important, all intend to air the minimum three hours a week of educational programming in order to receive expedited review of their license renewal applications. As pointed out earlier, a broadcaster need not air a full three hours of educational programming as long as it is engaged in other activities (short-form programming, community events) to serve the child audience. Airing less than three hours, however, means that the broadcaster must submit to a fuller review by the FCC. Most broadcasters seem reluctant to invite what they perceive as further interference by the government, so they have opted to comply rather than risk more stringent regulations in the future.

Anticipated universal compliance may also reflect the fact that the networks are increasing their offerings of educational programs. As of this writing, most have agreed to offer their affiliates the full three hours’ worth. Of course, the local broadcaster must trust that the networks are providing genuinely educational programs. Said one ABC affiliate: “We rely on the network. We don’t second-guess the network. If they say something’s educational, we buy into that.” A recent Annenberg Public Policy Center content analysis of children’s educational programs in one sample market indicates that such trust may be misplaced (see Jordan and Woodard, 1997). This study found that the majority of the networks’
educational offerings were only “minimally” or “moderately” educational. Syndicated programming, however, was much more likely to be rated as “highly educational.”

The increased availability of quality syndicated educational programs has also made the regulations less burdensome. In 1996/97, syndicators stepped up the production and marketing of their educational programs because they believed the three-hour rule would increase demand. As a result, there were far more acceptable educational programs to choose from for the 1997/98 season—by one respondent’s estimates, 35 to 40 new educational programs. As one respondent from an independent station said:

A benefit due to the legislation is that better-quality programs are being produced that are desirable for a programmer to acquire. There were a lot of programs out there that could be considered FCC-friendly or FCC-acceptable which were pretty weak programs. So there has been a huge launch pad now through syndicators knowing that they can get shows launched and there is a need and a requirement. It has also improved the quality and the amount of prospects out there.

Regarding these questions of impact, the majority of respondents seemed to subscribe to the theory of the “third person effect”—that is, the regulations will have a negative impact on other broadcasters but not on the respondent’s own organization. Most of the broadcasters said that they are already airing three hours of educational programming and that the only change in their own business practices would be to step up the reporting of the programs and shift around the air times. But because the parent networks are providing most, if not all, of the three hours’ worth of educational programs, the burden of actually locating and financing educational programs is not on the local broadcaster’s shoulders. In fact, preliminary data on 1997/98 hours indicate that the local network affiliates will do somewhat less educational programming next year than they did even this year (the smaller network affiliates and the independents will do somewhat more, going beyond the required three hours). Nevertheless, the actual responsibility for airing truly educational programs and communicating information about these programs ultimately rests with the local broadcaster.

If the broadcasters do what they say they will be doing next season—both in terms of reporting and programming requirements—the FCC regulations will have their intended effect. More educational programming will be aired at more reasonable hours and on a more consistent basis. However, several repercussions of the regulations may not have been anticipated by the regulators or the broadcasters.

**Unintended consequences**

Although they received some educational programs from the networks prior to the FCC’s three-hour rule, local broadcasters were chiefly responsible for ensuring that they were meeting the educational/informational needs of children. The language of the 1990 CTA was vague: there were no
time requirements for weekly program hours, and short-form programming, such as public service
announcements and interstitials, was an acceptable way to “serve the child audience.” A buses were
frequent— dubious programs were listed as educational, and public service announcements often took the
place of more serious educational efforts (Center for Media Education, 1992). The 1996 regulations laid
out a quantifiable goal: “three hours of regularly scheduled programs at least 30 minutes in length.”

With three hours of programming as a benchmark, there is a perception among local broadcasters
that nothing but core programming efforts will “count” in their application for license renewal. A number
of network affiliate respondents indicated that they would probably drop their short-form programs (for
example, news segments featuring local teens) and would cut back on their community efforts. This,
however, appeared not to be the case with independents, who have a greater interest in maintaining a
child audience.

Locally produced children’s educational shows are also likely to suffer. Prior to the new regula-
tions, many stations created their own programs to fulfill their children’s television requirements. The
networks provided only minimal amounts of educational programming, and the available syndicated fare
was of marginal quality. Now, with both network and syndicated programs in abundant supply, locally
produced programs are either too expensive or left without an available time slot in the schedule. This
seems unfortunate, as locally produced programs are likely to be one means by which stations can stay in
touch with the needs and interests of the children and parents in the community. Said a representative of
a CBS affiliate:

Unfortunately, we were not able to keep up [the local teen talk show] because of the time
frame. CBS will be providing us with weekend news. We didn’t have a program access
slot [for it] which meant that we would go to our network programming. We had to drop
production on the program, to discontinue that, and pick up all children’s programming
from the network.

A final, related unintended consequence of the proliferation of externally produced educational
programs is a local broadcaster’s seeming inability to shape the content of its educational programs in
response to the concerns of the local community. Local broadcasters receive their licenses by agreeing to
serve the public interest, but the “public” has become a nebulous, often national audience rather than a
community of local parents and children. With little or no educational material produced in-house, many
of the program directors and general managers had only the vaguest notion of what their educational
programs were about or who they were for. Most had to refer to written descriptions in discussing those
programs. Given the tight market constraints on local broadcasters, they may ultimately lack the institu-
tional capacity to directly respond to the concerns and interests of the local community regarding the
content of educational programs.
Conclusions and recommendations

The 28 broadcasters interviewed for this study have all begun to comply with the FCC’s reporting requirements that went into effect on January 2, 1997. They keep a public file, identify their educational programs on the air, and send information on their educational programs to newspapers, grid services, and TV Guide.

The broadcasters also intend to air a minimum of three hours of educational programming each week. Much of that programming will be provided by the networks, some will be selected from the abundant supply of syndicated fare, and very little will be locally produced. The overall tone of the interviews, however, indicates very little enthusiasm for the regulations. Even though the NAB agreed to abide by the three-hour rule in the weeks before the regulations were issued, broadcasters are typically resistant to any form of government regulation. In addition, most of the respondents seem confident in their belief that broadcasting educational programming will never be profitable.

The prevailing belief among broadcasters, particularly affiliates of the larger networks, is that children’s educational programs do poorly in the ratings, no matter where they come from or when they are aired. Said one respondent from a Fox affiliate:

The reality of it is this: as a television station and a free, over-the-air broadcast, for-profit enterprise, I have one thing to keep my television station on the air. That’s ratings. Everybody knows going in these shows don’t do ratings. They just don’t. Very seldom do you put a show like this on the air and be able to command a significant part of the audience.

Coinciding with the belief that educational shows are destined to be poorly rated is the conviction that the public does not care. Over and over broadcasters said that the three-hour rule was the brainchild of the advocates and that the public, by and large, would neither notice the change in programming nor care to watch such programs. Said a representative of an ABC affiliate:

I’ve been doing the educational/informational as well as the commercial reports on the Children’s Television Act that went into effect, what was that? 1990? And I have not ever had a parent or an educator come to me to look in the file or to look at these reports. No one has ever shown any interest in it.

The combination of these two widely held beliefs—that educational programs will never attract viewers and that the public at large doesn’t care about these efforts—may ultimately create a self-fulfilling prophecy. Only one respondent in 28 mentioned that the station promoted its educational programs beyond the newspaper listings and occasional on-air announcements. That respondent, from an NBC affiliate, mentioned that he had received some posters about the program “Saved by the Bell” that he was asked to distribute to local junior high and high schools. (He did not mention whether he had done so.)
It may be that these stations believe that no matter what promotional efforts they make, high ratings for educational programs cannot be achieved. It may also be the case that stations are already working at capacity and there are neither the resources nor the personnel to make a significant promotional effort. Said one overwhelmed respondent from an ABC affiliate: “You know, either there is a promotion director who is also a program director or else the general manager has taken over the program director duties... It's called downsizing, I guess.” In the end, a lack of effort to promote the programs will perpetuate a community of uninformed non-viewers.

This finding should be of serious concern to children's advocates and policymakers alike. The local broadcasters' feeling that parents and other local viewers do not care about educational programming is not surprising given the lack of local feedback about such programming. However, this lack of feedback may be evidence not of public apathy about children's educational programming but rather of the disjunction between national policy and local implementation. From the standpoint of the local citizen, the best way to improve children's programming has traditionally been to concentrate lobbying efforts at the federal level (through Congress and regulatory agencies such as the FCC). However, these national policies must be implemented by broadcast stations that may not perceive either the necessity or urgency for these changes and are therefore likely to see the regulations as unnecessary government intrusion into their business.

Recommendation #1: Educate the audience through outreach and promotion

Results from the Annenberg Public Policy Center's 1996 and 1997 studies of parents and children suggest that the broadcasters may be misreading confusion and lack of information as apathy. The most recent APPC survey (Stanger, 1997) indicates that the majority of parents (71%) are concerned about what their children watch on television, and only 16.5 percent said they were “very positive” or “mainly positive” about the quality of children's programming. In addition, surveyed parents are confused about broadcasters' labeling of educational programs. Only two percent of the parents could correctly tell the interviewer the meaning of the “E/I” label on broadcasters' programs (even though more than half of the respondents said their children would be more likely to watch a program if the children knew it was educational).

Local broadcasters should become more active in promoting educational programs within the community— raising awareness that these programs exist and how children benefit from them. Clearly, putting an E/I label on at the beginning of the program (or in the TV Guide) is not accomplishing the task. Materials related to the program could be distributed to local schools, after-school programs, camps, and youth organizations. Local tie-ins to national programs could raise awareness and interest in educational programs. Bill Nye (“the Science Guy”), for example, could host the local science fair; the local zoo could produce a segment for “Jack Hannah’s Animal Adventures.”

Recommendation #2: Develop resources by cultivating advertisers

With many stations already functioning at capacity and pouring their resources into the more lucrative adult programming, a joint effort between network and local broadcaster, or syndicator and local
broadcaster, would seem in order. An increased effort to encourage advertiser support might also be productive. Advertisers who market to children need to adjust their expectations of the type of audience educational programs can deliver. By definition, they must target a narrower segment in order to succeed (otherwise the material will be too advanced for some members of the audience and too simple for others). The programs therefore are unable to deliver the large numbers that can be expected of entertainment-only programs. Such shows do, however, offer other rewards—an audience that is more “engaged” in processing the content of the show, an aura of respectability, and the blessing of parents who, according to APPC surveys, care about what their children watch. One of our respondents from an NBC affiliate said:

The bottom line here is if there were shows out there that could meet the advertiser minimums, then we wouldn't have any problem at all. But they don't. What we hear from buyers is: “I gotta see a 5, I gotta see a 3.” And the shows don't do that well. So the reality of it is that the activist groups are really pointing the gun in the wrong direction. What they should be saying is...to the American public or, actually, to Kellogg's, they should be saying, “Wait a minute, you need to be in these shows. You need to support them financially and keep them on the air.”

One respondent from a different NBC affiliate pointed out that most of the large network affiliates do not even know how to sell advertising time on children's programs, since they do it so infrequently:

Well, for our sales department, they probably need to learn how to sell children's programming, which they have ignored in the past because it's only been a couple of hours and now that it's three hours every week they might figure out how to actually sell to children's programming.

Another respondent from an ABC affiliate, who seems to have given the issue some thought, stated:

I think if there's any success at all, it will be approaching a non-traditional advertiser and saying, “We're going to have this educational block, would you like to have your name associated with it?”

Recommendation #3: Involve other media

Newspapers and magazines also need to make a stronger commitment to providing information about children's educational programs. Aday's analyses of newspaper coverage of children's television (1996, 1997) indicate that children's television is rarely reviewed, and when it is, the stories do not provide the detail parents need to direct their children's viewing. Parents, for example, might benefit by knowing what age a program is intended for, what educational elements are incorporated into a program, and even whether the critic likes the program.
Recommendation #4: Solicit community input

Media outlets, including the television stations themselves, need to let parents know how they can contact a broadcaster. Many parents may care and may have strong feelings about children's television but lack an understanding of how or where to direct their comments. Do they write a letter to the FCC? Do they call the network that provides the programs? Do they call the local station? And while calling a local station for information about children's programming may seem logical, it may not be easy.

Researchers at the Annenberg Public Policy Center made calls to each of the Philadelphia-area commercial broadcasters to find the titles, air times, and target ages of educational programs. Most stations did not have a designated “children's television liaison” (as required by FCC regulations), and it often took repeated transfers and multiple phone calls to connect with the right person. That person was often reluctant to provide us with the information, even though it was supposed to be easily available to the public. If determined researchers encountered frustrations and obstacles to obtaining what is supposed to be public information, what might parents encounter? How might they react?

Clearly, then, developing a stronger relationship between the local broadcaster and the viewing community would be in order. Broadcasters who provide more information about their educational programs may find viewers who are more likely to spend time with the programs. An increase in ratings would be beneficial to all—the network, the broadcaster, the advertiser, and the child viewer. In addition, broadcasters who solicit input and feedback from their audience may get a more consistent and reliable reading of their viewers' needs and interests than the irate phone calls that come in after a particularly controversial program.
References


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Appendix: Interview protocol and questions

Interview protocol

I appreciate your willingness to speak with me about the impact of FCC regulations on local broadcasters' decision-making around children's television programming. I will be speaking with a couple dozen broadcasters around the country about this issue and will be including interview data in a larger report on the children's television industry that will be released in June. Let me assure you that the Annenberg Public Policy Center is an academic, non-partisan research center within the University. Our hope is that this study will increase the level of awareness of the rewards and challenges that face local broadcasters.

Let me also reassure you that anything you tell me will be strictly anonymous. Your name will not be used in the report; nor will it be connected to quotes that are used in the report. If you want to say something off the record, just let me know and the quote won't be used in the report. If you don't mind, I'd like to tape record our interview so that I don't have to scribble furiously while we talk.

Interview questions

1. Are you aware of the new FCC requirements regarding children's educational programming that went into effect last month?
   NO/DON'T KNOW
   Ask to speak with someone else who may know more about the regulations or might have more specific programming knowledge.
   YES
   Continue to the next question.

2. What is your understanding of these new regulations (what they are, and what they mean for your station)?

3. Can you tell me how your station intends to meet the requirements?
   PROBE ISSUES:
   (a). What is your station doing at present to support educational programs for children?
   (b). How, if at all, will you have to change your business or programming practices as a result of these new rules?
   (c). Will you use 3 hours of children's programming or less than that?
(d). What specific programs will you be using to fulfill the FCC requirement for children's educational programming?
(e). Where do (or will) you get this programming? Is it be supplied by the network, bought in syndication, or locally produced?
(f). Do you have a children's television liaison in place (hired)? Who is it and what is her/his job description?
(g). What actions, if any, will you take to provide information about these educational children's programs to the public (in program guides, local print media, etc.)?

4. How would you select an “educational” children's program that complies with the FCC requirements?
   **PROBE ISSUES:**
   (a). How do you decide which programs fit the FCC's requirements for children's educational broadcasting?
   (b). Do you rely on, for example, information provided by the network, marketing information about the programming, or your own judgment of the programming?

5. What concerns or hopes, if any, do you have about these new regulations?
   **PROBE ISSUES:**
   (a). In what time slots will you air (or are you airing) these educational children's programs?
   (b). What are some of the factors you consider when placing children's programs into your broadcast schedule?

6. What do you think the effect of these new programming and reporting requirements will be (on your station or on the country as a whole)?
   **PROBE QUESTIONS:**
   (a). Do you expect a change in your ratings because of these new educational children's programs?
   (b). What do you think the community response will be?
   (c). Do you expect a change in the overall revenue of the station as a result of these new regulations?

*Conclude Interview*

Those were the questions that I had for you. Thank you very much for speaking to me, and if you have any further comments or questions about your interview or this study, feel free to contact me at the Annenberg Public Policy Center.