

From: Beeby, Craig
Sent: Wednesday, July 12, 2006 1:52 PM
To: U:SA List
Subject: U:SA Board Response to CPB's CSI Proposal

Dear U:SA Member,

To follow is the U:SA Board of Director's response to the CPB Community Service Incentive "CSI" proposal ...

July 6, 2006

Mr. Greg Schnerring
Vice President-Radio
Corporation for Public Broadcasting

Dear Greg:

The majority of CPB qualified stations are university-licensed and the University:Station *Alliance* Board of Directors is writing to express our thoughts regarding the current Community Service Incentive proposal. Now that CPB has gathered additional data through the trial conducted this spring, we hope the CPB staff and the upcoming CSG Review Panel will recognize the need to modify the proposal to assure that implementation of the program does not create a negative impact on the stations.

As currently configured, the CSI is a redistribution of CSG funds instead of being an "incentive". The U:SA requests that incentive programs be funded from new monies and/or non-CSG funds. At the least, please consider allowing 2007 to be a transition year on some or all of the requirements.

Some of the ideas suggested, such as creation of a substitute board in institutional licensees, may require additional time in order to gain authorization of college officials and establish a quality oversight body.

It takes time to organize such a delicate endeavor and mistakes in managing this task could have long term negative repercussions. We acknowledge that deepening and broadening stations' community connections is a commendable goal. But absent models and toolkits, creation of substitute boards could present new problems for some or many institutional licensees.

Many institutional stations have no precedent for advisory or fundraising Boards and there may be confusion about where to draw lines among advisory, governance, and management functions. There will also be questions about making the case with the institution for creation of a substitute board. How can CPB assist stations in creating buy-in in transitioning from primarily campus-based accountability? We suggest that stations have time to be equipped with case studies, best practices, templates, etc. U:SA would be a logical agent to assist by developing and disseminating information. The U:SA notes that this issue, as well as working with licensees on issues of major giving, is a specific concern of college licensee.

We agree that accessibility of financial and other information regarding public stations should be transparent and applaud this step, which many stations already do as a matter of course. Perhaps this requirement should be considered in the basic grant requirements mechanism rather than separated out for "incentives".

The University:Station *Alliance* concurs that stations must continually improve service to their local communities. However, the U:SA encourages CPB to insure that implementation timetables are consistent with giving stations adequate time to resolve the many internal issues. Is there a mechanism for a station to request a waiver or postponement based on its local situation?

Another concern frequently raised by our affiliates regards the specification of a "one hour " minimum for local news content in the service index. This is inconsistent with other research funded by CPB. Many of our stations perform excellent public service through short form news content within national drive-time programs. Few stations are able to devote the resources to local content consistent with this one hour minimum requirement, although many offer a significant news service as recognized by journalistic awards. We suggest that, devoid of new funds being provided in time to develop such a service, that a more realistic approach be taken. This length of programming could possibly be reviewed in future years as the CSG Review Panel considers the outcome and current audience research.

We question the criteria for the number of 'hits' to a station's website. For large markets, a station would have to commit significant resources to create enough web content to generate sufficient hits to meet the criteria. Given that it has never been proven that a robust website will result in greater listener satisfaction or any 'break-even' revenue, we suggest that CPB reconsider the proposed standards or

develop a phase-in strategy.

We appreciate the efforts of the CPB staff and the various CSG review panels and we are willing to work together with CPB to get it right. Thank you for the opportunity to respond and your consideration.

Sincerely,

The University:Station Alliance Board of Directors

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Craig Beeby, U:SA President
Director/General Manager
Oklahoma Public Radio KOSU
Oklahoma State University
Office: 405 744 9973
craig.beeby@okstate.edu
91.7 Oklahoma City
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