

# BROADCASTERS' NEWS BULLETIN

Reporting accurately and promptly current happenings of special interest to Broadcasting  
Stations in the Commercial, Regulatory, Legislative and Judicial Fields

Issued by

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## THE NATIONAL ASSOCIATION OF BROADCASTERS

Incorporated

NATIONAL PRESS BUILDING  
WASHINGTON, D. C.

Telephone District 9497

## EXECUTIVE PERSONNEL

PHILIP G. LOUCKS  
Managing Director  
EUGENE V. COGLEY  
Assistant to Managing Director  
OLIVINE FORTIER  
Secretary

March 28, 1931

## REPORT OF BOARD OF DIRECTORS MEETING

The Spring meeting of the Board of Directors of the National Association of Broadcasters was held at Hotel Statler, Detroit, Michigan, on Tuesday, March 24, 1931.

President Walter J. Damm, WTMJ, Milwaukee, Wisconsin, presided. Other officers in attendance were: Edwin M. Spence, WPG, Atlantic City, N.J. vice-president; Paul W. Morency, WTIC, Hartford, Conn. treasurer; and Birt F. Fisher, who represented O. D. Fisher, KOMO, Seattle, Wash. vice president.

Members of the Executive Committee in attendance were: William S. Hedges, WMAQ, chairman; Henry A. Bellows, WCCO, Minneapolis, Minn.; and Frank M. Russell, WRC, Washington, D. C.

Members of the Board present were: Eugene O'Fallon, KFEL, Denver, Colo.; Arthur B. Church, KMBC, Kansas City, Mo.; H. K. Carpenter, WPTF, Raleigh, N.C.; Henry A. Bellows, WCCO, Minneapolis, Minn.; William S. Hedges, WMAQ, Chicago, Ill.; Morgan L. Eastman, WENR, Chicago, Ill.; Leo Fitzpatrick, WJR, Detroit, Mich.; A. J. McCosker, WOR, Newark, N. J.; Edgar L. Bill, WLS, Chicago, Ill.; and J. G. Cummings, WOAI, San Antonio, Texas.

Others present were: A. A. Cormier, WOR, Newark, N. J.; Norman White, WJR, Detroit, Mich.; and John F. Patt, WGAR, Cleveland, Ohio; and the Managing Director.

Executive Committee: William S. Hedges, Chicago, Ill., Chairman; Henry A. Bellows, Minneapolis, Minn., and Frank M. Russell, Washington, D. C. Directors: William S. Hedges, Chicago, Ill.; H. K. Carpenter, Raleigh, N. C.; George F. McClelland, New York, N. Y.; Dr. Frank W. Elliott, Davenport, Ia.; A. J. McCosker, Newark, N. J.; Edgar L. Bill, Chicago, Ill.; A. B. Church, Kansas City, Mo.; J. G. Cummings, San Antonio, Tex.; Don Lee, Los Angeles, Cal.; E. P. O'Fallon, Denver, Colo.; C. R. Clements, Nashville, Tenn.; Henry A. Bellows, Minneapolis, Minn.; John J. Storey, Worcester, Mass.; Morgan L. Eastman, Chicago, Ill.; and Leo Fitzpatrick, Detroit, Mich.

Minutes of the last Board meeting held at Cleveland, Ohio, November 19, 1930, were read and approved.

The report of the Managing Director was read and approved. The report, with several unimportant omissions, begins on Page 7.

The action of the Executive Committee reducing dues of local stations to \$125. annually was approved subject to ratification by the membership.

Members of the Executive Committee were appointed as a committee to co-operate with the Internal Revenue Bureau in a study of depreciation rates for broadcasting stations with instructions to report the results of the study to the Board.

The membership applications of the following were approved:

W C A E	Pittsburgh, Pa.	Kaufman & Baer Company
W E B Q	Harrisburg, Ill.	First Trust & Savings Bank
W E L L	Battle Creek, Mich.	The Enquirer-News
W G A R	Cleveland, Ohio	WGAR Broadcasting Company
W H B C	Canton, Ohio	St. John's Catholic Church
W J A C	Johnstown, Pa.	Johnstown Automobile Company
W J B K	Detroit, Mich.	James F. Hopkins Inc.
W J R	Detroit, Mich.	WJR, The Goodwill Station Inc.
W J S V	Alexandria, Va.	Independent Publishing Company
W K B N	Youngstown, Ohio	W K B N Broadcasting Corporation
W K Z O	Berrien Springs, Mich.	WKZO, Incorporated
W N B H	New Bedford, Mass.	New Bedford Broadcasting Co
W O L	Washington, D. C.	American Broadcasting Company
WORC-WEPS	Worcester, Mass.	Alfred F. Kleindienst
W R C	Washington, D. C.	National Broadcasting Company Inc.
W S M B	New Orleans, La.	Saenger Theatres & Maison Blanche Co
W S P A	Spartanburg, S. C.	The Voice of South Carolina



W T A X	Springfield, Ill.	WTAX, Incorporated
W T O C	Savannah, Georgia	Savannah Broadcasting Company Inc.
K F J I	Astoria, Oregon	KFJI Broadcasters Inc.
K F V S	Cape Girardeau, Mo.	Oscar C. Hirsch
K G D Y	Huron, South Dakota	Voice of South Dakota
K Q V	Pittsburgh, Pa.	KQV Broadcasting Company
K G I W	Trinidad, Colorado	Leonard E. Wilson
K J R	Seattle, Washington	Northwest Broadcasting System
K W C R	Cedar Rapids, Iowa	Cedar Rapids Broadcasting Corp.
	New York, N. Y.	John V. L. Hogan
	New York, N. Y.	Neville O'Neill Inc.
	New York, N. Y.	Radio Broadcasters of America Inc.
	New York, N. Y.	Western Electric Company Inc.

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W A W Z	Zarephath, New Jersey	Pillar of Fire
W H A D	Milwaukee, Wisconsin	Marquette University
K P O F	Denver, Colorado	Pillar of Fire

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The Board approved a motion to hold the Ninth Annual Convention at Detroit, Michigan, on October 26, 27 and 28, 1931. Arrangements for the convention will be in charge of Edwin M. Spence, WPG, Atlantic City, N. J.

Two regional meetings will be held during the Summer months in the South and the West. These will be open meetings and all stations will be invited to attend. The Southern meeting will be in charge of a committee headed by J. G. Cummings, WOAI, San Antonio, Texas, and the Western meeting will be in charge of Birt F. Fisher, KOMO, Seattle, Washington. Board meetings will be held simultaneously with the regional meetings.

Morgan L. Eastman tendered his resignation as a Director due to the change in the status of WENR. His resignation was accepted with regrets. E. B. Craney, KGIR, Butte, Montana, was appointed to serve until the next annual convention.

The Board adopted the following resolution:

RESOLVED: That the Board of Directors of the National Association of Broadcasters heartily approves of any action by the Federal Radio Commission which, within the limits of mechanical practicability and without compelling the reconstruction of existing broadcast transmitters, will decrease the variation of carrier frequencies, and pledges its cooperation in making such action effective, Provided: that the determination of the minimum frequency deviation which may be permitted is obviously a matter to be determined solely by engineers on the basis of exact information as to the precision, availability and cost of the necessary apparatus both for maintaining frequency and for measuring it.

Radio and copyright legislation was discussed at length and the Copyright and Legislation Committees were given requested instructions with respect to the Association's legislative campaign in the next session of Congress.

The Executive Committee was designated as a committee to prepare a revision of the Constitution and By-Laws of the Association with a view to presenting such revision to the membership at the next annual meeting.

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#### REPORT OF THE MANAGING DIRECTOR

This report covers the activities of the National Association of Broadcasters during the four months period from November 19, 1930 to March 19, 1931. During this period headquarters of the Association were moved from New York to Washington; the office of the Managing Director was completely

reorganized; the general scope of activities was expanded; several new service features were instituted; and the number of active members increased by forty per cent.

At all times the Managing Director has worked in close harmony with other officers of the Association and members of the Executive Committee who willingly gave much of their time and energy to the work of the Association. To describe in detail the work that has been accomplished would require a report too lengthy for presentation here. This report, therefore, must necessarily deal with generalities, leaving detailed information to supplementary reports.

#### TRANSFER OF HEADQUARTERS

In conformity with action of the Board of Directors taken at the organization meeting held at Cleveland, Ohio, on November 19, 1930, headquarters of the Association were transferred from 11 West 42d Street, New York, N. Y. to the National Press Building, Washington, D. C. Although the transfer took place immediately, the New York office was not closed until December 15, 1930. The lease of the New York office, however, does not expire until March, 1932. Until January 1, 1931, headquarters were established in temporary rent-free offices in the National Press Building.

At a meeting of the Executive Committee held in Washington on December 3, 1930, the Managing Director was authorized to sign a lease with the National Press Building Corporation for quarters located in Suite 960-970 National Press Building. The term of the lease is for five years, cancellable at the expiration of each year upon 30 days notice in writing.



## MEMBERSHIP

On November 19, 1930, there were 83 active members on the rolls of the Association, of which 52 were in good standing. Associate members numbered 35. On March 19, 1931, there were 118 active members on the rolls of the Association, of which 103 were in good standing. On the same date Associate members totaled 38. There was an increase therefore of 35 Active members and three Associate members during the period from November 19, 1930 to March 19, 1931. An analysis of the Active membership list as of March 19 shows that 31 members are assigned to clear channel positions; 49 to regional channel positions; 21 to local channel positions; 6 to limited time positions; and three to daylight positions. Eight are members not engaged in the business of broadcasting.

During the month of February every broadcasting station in the United States received the Association's weekly bulletins as a part of a drive for new members. In addition to this each local station received two letters, the first informing him of the reduction in dues and the second inviting affiliation with the Association. A list of 138 selected regional stations likewise received letters inviting their membership in the Association. Local stations and the list of selected regional stations received membership application blanks. During the month two special bulletins, one dealing with the Vestal bill and another outlining the activities of the Association, were mailed to all stations.

## BROADCASTERS' NEWS BULLETIN

The general style of the BROADCASTERS' NEWS BULLETIN has been improved since last November. Since November 19, 1930, the Association has published 17 issues of the BULLETIN, representing 205 pages of news matter and containing approximately 87,125 words. Approximately 5,000 copies of the BULLETIN have been mailed from headquarters within the past four months. Five SPECIAL BULLETINS, representing 55 pages and containing a total of 22,000 words, were mailed in addition to the regular weekly publications. Four press releases were distributed during the four months period.

The preparation of these BULLETINS requires the attention of the entire staff at least one full day during each week. These publications serve a useful purpose and the Association has concrete evidence that they are greatly appreciated. There is much room for improvement, however, and several new departments will be added in the future.

## SERVICE BUREAU

For the purpose of keeping members informed individually of all applications and decisions of the Federal Radio Commission affecting their assignments, a Service Bureau was organized on January 20th with Mr. Cogley in charge. Because of Mr. Cogley's experience with the Commission he is eminently qualified for this work. All applications are indexed according to a system similar to that followed by the Commission and each step in their progress through the Commission is carefully noted. Since its creation, this Bureau wrote 226 letters to members informing them of new applications involving their station assignments and 106 letters notifying them of Commission action on cases in which they were interested. Copies of Examiners' reports are promptly mailed to interested members. Since January 20th this Bureau, at the request of members, sent 75 telegrams carrying spot information. The Bureau contacts constantly the various sections and divisions of the Commission and has handled numerous routine matters for members, requiring much time and attention.

This Bureau also handles inquiries and investigations and since its creation has answered more than 200 queries and investigated six different commercial enterprises at the request of members.

### REVISION OF CONSTITUTION

In accordance with the recommendation of the Board of Directors, the Constitution and By-Laws of the Association have been carefully studied and a draft of the revisions proposed should be considered during this meeting. Only one change is proposed in the present Constitution and this is of minor importance. The Constitution follows almost verbatim the wording of the Certificate of Incorporation of the Association. Several clarifying amendments are suggested for the By-Laws but the principal change proposed relates to a schedule of dues. This Board should give consideration to a revision of the existing schedule of dues. The Board should decide whether or not the Constitution and By-Laws in their revised form shall be submitted at the next annual meeting. The action of the Executive Committee reducing dues of local stations to \$125.00 per year should be approved by the Board subject to ratification by the membership.

### LEGISLATION

Twenty-one bills and resolutions relating to the regulation of radio were introduced in the Seventy-first Congress which adjourned on March 4, 1931. Of this number only three became law. One related to our Government's participation in the meeting of the C. C. I. R. meeting at The Hague; another authorized the construction of a radio research laboratory in Washington; a third amended Section 16 of the Radio Act of 1927, relating to appeals from decisions of the Radio Commission.

The most important general legislation before the Congress was the Couzens Communications Commission bill which did not reach the stage of Committee approval in the Senate.



During the closing days of the Congress there was reported to the Senate a bill providing certain corrections in the Radio Act of 1927; transfer of the Radio Division of the Department of Commerce to the Radio Commission; suspension of licenses for cause; painting of all radio towers; and elimination of certain territories and possessions from the Zones created by the Davis Amendment. This bill was in reality a substitute for the White bill to make certain minor corrections in the existing radio act and which had passed the House on April 30, 1930. When the bill was considered by the Senate, Senator Glenn of Illinois, offered an amendment, with the sanction of the Senate Committee on Interstate Commerce, making a Congressional allocation of one clear channel to labor organizations. To the great surprise of the entire radio industry, the bill as amended passed the Senate at a night session without a single dissenting vote. It was returned to the House the following day and the Association realizing the dangers in the measure, petitioned the House Merchant Marine and Fisheries Committee for hearings. The petition was considered but no hearings were held. Instead the bill was permitted by Senator-elect White to die on the Speaker's table.

The most vicious piece of legislation before the Congress was the bill introduced by Senator Fess of Ohio, apparently at the behest of certain educational interests, which would set aside 15 per cent of all broadcasting frequencies in the United States for the exclusive use of education. The measure did not reach the stage of hearings. The bill, however, will be reintroduced in the next session of Congress and Mr. Armstrong Perry, director of the National Committee on Education by Radio, informed your Managing Director that within the past few days his Committee had been given funds in addition to the \$200,000 donated by the Payne Fund to secure passage of the measure. No more important issue confronts American broadcasters, and the Association must be prepared to meet it fairly and squarely.

The Association has been notified of fifteen radio bills which have been introduced in the various State Legislatures. With the coming of another national political campaign it is to be expected that attempts will be made to subject broadcasting to political domination. These bills generally are loosely drawn by legislators who have no conception of the technical and economic problems of broadcasting. Many more of these measures will bob up from time to time and the Association should be in a position to give each one careful study and actively oppose all measures which are inimical to the best interests of broadcasting and in conflict with existing Federal law.

### THE COURTS

During the period from November 19, 1930 to March 19, 1931, the Court of Appeals of the District of Columbia handed down ten decisions involving broadcasting stations. The titles of these cases and the dates of decisions are as follows:

- W. O. Ansley, jr. v F. R. C. No. 5149. Decided 12/1/30.
- Havens and Martin v F. R. C. No. 5141. Decided 12/1/30.
- Louisville Courier Journal-Times v F. R. C. No. 5100. Dec. 1/6/31.
- Saltzman et al v Stromberg-Carlson Tele. Co. No. 5278. Decided 1/6/31.
- Westinghouse Elec. & Mfg Co. v F.R.C. Nos. 5104, 5105, 5192, 5150.  
Decided 1/6/31.
- Marquette University v F.R.C. No. 5253. Decided 2/2/31.
- General Broadcasting System v F.R.C. No. 5196. Decided 2/2/31.
- KFKB Broadcasting Assn v F.R.C. No. 5240, Decided 2/2/31
- The Journal Company v F.R.C. Nos. 5095, 5163, 5268, 5269.  
Decided 3/2/31
- Reading Broadcasting Co. v F.R.C. No. 5254. Decided 3/2/31.

Several important legal principles may be deduced from these decisions. The Commission may not, without hearing, change any of the material terms of

a broadcasting station license and if a hearing is held the issues must be clearly defined and the presentation of testimony must be in accordance with recognized legal practice. Stating it conversely, a station has a right to continue to operate in accordance with the terms of its license and to continue to have access to its normal service area, as long as it meets the administrative standard of public interest, convenience and necessity. In determining whether or not a station is adequately meeting the standard, the Commission may take into consideration its past record of service. Public service is the paramount consideration and the court has not based any of its recent decisions upon the several orders which the Commission has promulgated to equalize facilities.

At the present time two cases are pending in the Court of Appeals, namely: Fisher's Blend Station v F.R.C. and Rev. John W. Sproul v F.R.C.

Two cases are also pending in the Supreme Court of the District of Columbia, namely: Stromberg-Carlson v F.R.C. and Baltimore Radio Show v F.R.C.

During the period covered by this report two criminal prosecutions under the Radio Act took place in the Federal Courts. William R. Duncan was tried and convicted in the U. S. District Court of Oregon for using obscene language and George W. Fellowes was tried and convicted in the U. S. District Court for the Eastern District of Missouri for operating a station without a license. Three criminal cases are now pending in the Federal courts and several additional cases will be instituted shortly.

The Supreme Court of the United States heard argument in the American Bond and Mortgage Company and Clinton R. White cases which were certified to this tribunal by the Circuit Court of Appeals for the Seventh Circuit. The court remanded both cases to the lower court for further hearing on the record. The Supreme Court has not yet passed upon the constitutionality of the Radio Act of 1927.



Argument was heard on March 3 and 4 in the cases of Buck et al v Jewell-LaSalle Realty Co. by the Supreme Court. The Association filed a brief in these cases as friend of the court. The cases involve the question of whether or not a receiving set in a place of business is performing for a profit a copyright number when it receives such performance from a broadcasting station. To supply requests, the Association was compelled to have 250 copies of its brief printed. The case will probably be decided during the present term of court.

### THE COMMISSION

The Federal Radio Commission adopted six general orders during the period covered by this report, four of which related to broadcasting. General Order No. 102, adopted January 8, is an attempt on the part of the Commission to equalize facilities among the zones and states. General Order No. 103, adopted on January 20, extended broadcasting licenses from January 31 to April 30, except with respect to certain stations. General Order No. 105, adopted February 12, is an attempt to define a broadcasting day, time sharing and set up rules governing daylight and limited time operation. The effective date of the order has been postponed until April 30. General Order No. 106, adopted on February 16, makes the keeping of studio and transmitter logs compulsory. The Association requested the Commission to postpone the effective date of this order from March 1 to April 30 and the request has been granted. The Association last week filed with the Commission a brief outlining suggestions for the clarification of the order.

The Commission now proposes to amend General Order No. 7 and require a frequency deviation tolerance of 50 cycles instead of 500 cycles. The proposed new order would not become effective for a year. It is gratifying to note that the Commission voted to hold public hearings before promulgating

this new order. Such hearings will be held at Washington on April 20. There is a difference of opinion among members of the Association as to the propriety of the order and considerable doubt prevails as to whether the Association should take any part in the hearing although the Commission has invited it to do so.

The Examiners Division, which now includes four examiners, handed down 80 reports from November 19 to March 19, and of this number less than half have been acted upon by the Commission. Up to the present time the Commission has refused to hear oral arguments on exceptions taken to reports. However, the Commission did decide last week to hear arguments of counsel in the 50 KW cases on April 14. These cases grew out of the Commission's amendment to General Order No. 42 limiting the number of 50 KW channels to 20, or four per zone.

One of the most constructive moves of the Commission in recent months was the decision to extend broadcasting licenses from three months to six months. The first six months period will commence on May 1. Although a much longer license term is desirable, it is believed that the six months term, in a small degree, will help stabilize industry.

The Commission is also endeavoring to simplify application forms and it is hoped that within the next few months there will be issued a compilation of all General Orders with suitable annotations. Official call letter, state and frequency lists are now available in printed form.

Permits to conduct synchronization tests have been granted and the Commission is now giving careful study to the experimentation now being carried on by four eastern stations.

After comprehensive hearings the Commission made several important revisions in the regulations governing experimental television.

Within the past two weeks the Commission announced the result of an educational survey. While the survey shows that commercial stations are de-

voting about 10 per cent of their entire time to educational broadcasting, no suitable definition of an educational program is given. The information, however, will prove valuable in meeting the criticism of certain educational groups directed against commercial stations.

### COMMITTEES

The President announced the following appointments of Committee Chairman on December 3, 1931:

Convention - - -	Edwin M. Spence, W P G, Atlantic City, N. J.
Commercial - - -	H. K. Carpenter, W P T F, Raleigh, N. C.
Local - - - - -	Roy F. Thompson, W F B G, Altoona, Pa.
Regional - - - -	Harry Shaw, W M T, Waterloo, Iowa
Ethics - - - - -	Dr. Frank W. Elliott, WOC-WHO, Des Moines, Ia.
Copyright - - -	Morgan L. Eastman, W E N R, Chicago, Ill.
Educational - -	Miss Judith Waller, W M A Q, Chicago, Ill.
Legislative - -	Henry A. Bellows, W C C O, Minneapolis, Minn.
Membership - - -	Paul W. Morency, W T I C, Hartford, Conn.

The chairmen were officially notified of their appointments and each committee member was written a personal letter by the Managing Director informing him of his committee appointment and enclosing a complete list of committee members and their addresses.

The Commercial Committee held a joint meeting with the Radio Committee of the American Association of Advertising Agencies in New York last month. The Commercial Committee is now considering the appointment of a sub-committee on agency recognition and recordings.

The Engineering Committee will hold its first meeting next month to discuss the so-called Craven plan for improvement of broadcasting conditions.



A committee of the Association has been appointed to co-operate with the Department of Interior on the subject of educational broadcasting. This committee was appointed following a conference between Secretary of the Interior Wilbur and Henry A. Bellows in January of this year.

The Managing Director is informed that a meeting of the Regional Committee will be held within the next several weeks. The Legislative Committee already has before it a general program outlined by the chairman.

The Educational and Copyright Committees will be called upon for an enormous amount of work in advance of the next convention and undoubtedly will be called upon to hold frequent meetings.

#### COPYRIGHT

Principal interest in music copyright during the four months covered by this report centered around the Vestal Copyright Bill. When the short session of Congress convened last December the House had already considered the first eight sections of the measure although the broadcasting industry had not made known its opposition. The measure had been carefully studied during the summer months and it was decided that several important amendments to the Vestal bill were necessary to protect the interests of broadcasters. The Association prepared a pamphlet entitled "Discussion of the Vestal Copyright Bill from the Point of View of the Broadcaster" copies of which were sent to every broadcasting station in the United States.

Individually typed letters and copies of the pamphlet were mailed to each of the 435 members of the House. Notwithstanding these efforts, the House passed the bill with a vote of 184 to 35 and before the bill was officially reported to the Senate the Senate Committee on Patents voted to report it favorably.

Quick action on the part of the Association, and the splendid co-operation of Senator Clarence C. Dill of Washington, caused the Committee to reverse its position and grant hearings. Hearings accordingly were held on January 28 and 29 and the Association was represented by Chairman Hedges, H. A. Bellows, Paul W. Morency, Harry Butcher, and the Managing Director. Chairman Hedges made a preliminary statement which was followed by a scholarly presentation of the broadcasters' arguments by Louis G. Caldwell, special counsel to the Joint Copyright Committee. Mr. Caldwell presented a number of amendments drafted to meet objections of broadcasters. The bill, with the most important of the broadcasters' amendments included, was reported to the Senate on February 17. Although several additional amendments were desired, the Association withdrew its active opposition to the bill. The bill, however, got caught in the legislative jam near the end of the session and although it was discussed on a half dozen occasions, it failed to secure Senate approval.

(The cost of the copyright fight to the Association was in excess of \$8,000 when counsel fees, printing and mailing costs are considered.

The copyright issue will be before the next Congress and the Association must be prepared to meet it. The Association should have its own bill to put forward.

In the meantime there appears no hope of settling the copyright license fee problem. Owners of music copyright are roundly increasing license fees to broadcasting stations and there appears to be no inclination on the part of copyright owners to make their charges uniform. Only in one case brought to the attention of the Association was the principal license issued without substantial increase in the fee.

## INTERNATIONAL SITUATION

The international situation as it affects broadcasting in the United States will be discussed at length at this meeting and will not be considered in this report.

The Managing Director last February was named on the allocations sub-committee of the committee preparing for the International Radiotelegraph Conference at Madrid, Spain, in 1932. The work of the main committee has virtually been completed and the proposals of the United States are now being transmitted. These proposals do not contain any recommendation with respect to widening of the broadcast band although European nations are understood to advocate such extension. It may become advisable when European proposals are received to ask the main Committee to amend its proposals to conform with the requests of foreign countries. This is a matter which will require extensive study. It may, however, have a very important bearing upon the general North American broadcasting situation.

The Executive Committee adopted a resolution designating President Damm as its official representative to the meeting of the C. C. I. R. at Copenhagen next May. The State Department has been advised of this action. While it is highly desirable that the Association should be represented at the Copenhagen meeting, no funds will be available to defray expenses of travel.

The Association has been invited to participate in the movement started in Europe last Summer for the formulation of an international broadcasting code. The Association also has been requested to exchange literature and information with Australian radio authorities. The Managing Director is a member of the American Section, International Committee on Wireless Telegraphy which is giving constant study to international broadcasting problems.



## 1930 CONVENTION

A final financial statement of the Eighth Annual Convention of the Association held at Cleveland, Ohio, November 17, 18 and 19, 1930; is herewith submitted. The statement follows:

## CONVENTION

## Final Accounting

<u>RECEIPTS</u>		<u>EXPENDITURES</u>	
Convention - Registration	\$1,390.00	Convention - General Expense	\$841.39
Convention - Proceedings	13.00	Convention- Traveling Expense	388.33
Convention - Proceedings	442.80	Proceedings:	
		Printing - - - - -	\$608.25
		Envelopes - - - - -	12.50
		Postage - - - - -	7.07
		Refund - - - - -	3.00
	<u>          </u>		<u>630.82</u>
	\$1,845.80		\$1,860.54
Proceedings ordered - - -	<u>25.00</u>	Difference - - - - -	<u>10.26</u>
	\$1,870.80		\$1,870.80
	- - - - -		- - - - -

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It is urged that the Board at this meeting name the date and place of this year's convention in order that plans may be developed during the Summer months. The advisability of again throwing open the convention to all broadcasting stations in the United States should also receive consideration.

The Convention Committee should be appointed just as soon as a date and place for the 1931 meeting are chosen and plans should go forward without delay. The general plan followed in organizing the 1930 meeting should be adopted for this year's convention.

## CONCLUSION

The Managing Director desires to thank President Damm, Vice-President Spence, Treasurer Morency, Chairman Hedges, Messrs. Bellows, Russell and the members of this Board for the co-operation they have given his office during the four months of his incumbency. He desires also to thank Committee chairmen for the interest they are taking in the affairs of the Association.

The vast amount of work performed by the Managing Director's office could not have been accomplished without the fine loyalty and co-operation of Mr. Cogley and Miss Fortier. The work of Mr. Cogley has been referred to elsewhere in this report. Miss Fortier also has displayed unusual ability in the performance of her numerous and exacting duties.

This report covers an important period in the life of the Association. Many new policies have been instituted and the scope of activities has been expanded. The process of virtual reorganization was not accomplished without an enormous amount of work and it is gratifying to note that the efforts of the Managing Director's office have been appreciated by the membership.

PHILIP G. LOUCKS  
Managing Director

# THE NATIONAL ASSOCIATION OF BROADCASTERS

## ACTIVE MEMBERS

AS OF MARCH 19, 1931

<u>STATION</u>	<u>POWER</u>	<u>NAME AND ADDRESS</u>
W A A W	500 W.	F. P. Manchester OMAHA GRAIN EXCHANGE Omaha, Nebraska
W A B C	5 KW	Paul Greene ATLANTIC BROADCASTING CORPORATION 485 Madison Avenue New York, N. Y.
W A D C	1 KW	Allen T. Simmons ALLEN THEATRE BROADCASTING COMPANY Tallmadge, Ohio
W A I U	500 W.	Miss Marie W. Vandegrift AMERICAN INSURANCE UNION Columbus, Ohio
W B A L	10 K W	H. A. Wagner CONSOLIDATED GAS & ELECTRIC COMPANY Baltimore, Maryland
W B B M	25 K W	H. Leslie Atlass ATLASS COMPANY INC. 410 No. Michigan Avenue Chicago, Illinois
W B E N *	1 K W	Marvin C. Morrison BUFFALO EVENING NEWS Buffalo, New York
W B T	5 K W	E. J. Gluck W B T INCORPORATED Charlotte, North Carolina
W C A E *	1 K W	J. L. Kaufman KAUFMAN & BAER Smithfield Street & Sixth Avenue Pittsburgh, Pennsylvania
W C A O	250 W.	R. V. O. Swartwout MONUMENTAL RADIO INCORPORATED Baltimore, Maryland
W C A U *	10 K W	Dr. Leon Levy UNIVERSAL BROADCASTING COMPANY Philadelphia, Pa.



<u>STATION</u>	<u>POWER</u>	<u>NAME AND ADDRESS</u>
W C C O	7 $\frac{1}{2}$ K W	E. H. Gammons NORTHWESTERN BROADCASTING COMPANY Minneapolis, Minnesota
W C L O *	100 W.	H. H. Bliss WCLO RADIO CORPORATION Janesville, Wisconsin
W C S H	1 K W	William L. Foss CONGRESS SQUARE HOTEL COMPANY Portland, Maine
W D A F	1 K W	H. Dean Fitzer KANSAS CITY STAR Kansas City, Missouri
W D E L	250 W. 350 W. LS	Willard Wilson WDEL INCORPORATED Wilmington, Delaware
W D R C	500 W.	F. M. Doolittle DOOLITTLE RADIO CORPORATION Hartford, Connecticut
W E A F	50 K W	George F. McClelland NATIONAL BROADCASTING COMPANY 711 Fifth Avenue New York, N. Y.
W E A N	250 W. 500 W. LS	Roy Harlow SHEPARD BROADCASTING SERVICE INC. Providence, Rhode Island
W E B C	1 K W 2 $\frac{1}{2}$ K W LS	W. C. Bridges HEAD OF THE LAKES BROADCASTING CO. Superior, Wisconsin
W E B Q *	100 W.	George O. Davenport, Vice President FIRST TRUST & SAVINGS BANK of Harrisburg, Illinois
W E E I	1 K W	J. B. Force EDISON ELECTRIC ILLUMINATING CO. of Boston, Massachusetts
W E L L *	50 W.	A. L. Miller, President THE ENQUIRER-NEWS Battle Creek, Michigan
W E N R	50 K W	Niles Trammel, Vice President NATIONAL BROADCASTING COMPANY INC. Chicago, Illinois

<u>STATION</u>	<u>POWER</u>	<u>NAME AND ADDRESS</u>
W F B G	100 W.	Roy F. Thompson WM F. GABLE COMPANY Altoona, Pennsylvania
W F B M	1 K W	Blythe Q. Hendricks, Director INDIANAPOLIS LIGHT & POWER COMPANY 229 North Pennsylvania Street Indianapolis, Indiana
W F D F	100 W.	Frank D. Fallain FLINT BROADCASTING COMPANY Flint, Michigan
W F I	500 W.	STRAWBRIDGE & CLOTHIER Philadelphia, Pennsylvania
W G A R *	500 W.	John F. Patt, President WGAR BROADCASTING COMPANY Cleveland, Ohio
W G B S *	250 W. 500 W. LS	Dailey Pashman GENERAL BROADCASTING SYSTEM Hotel Lincoln New York, N. Y.
W G N	25 K W	Quinn A. Ryan CHICAGO TRIBUNE Chicago, Illinois
W G R	1 K W	I. R. Lounsberry, Vice President BUFFALO BROADCASTING CORPORATION Buffalo, New York
W H A S	10 K W	Credo Harris COURIER JOURNAL & LOUISVILLE TIMES Louisville, Kentucky
W H B C *	10 W.	L. J. Callinan ST. JOHN'S CATHOLIC CHURCH 319 Tuscarawas Street West Canton, Ohio
W H K	1 K W	E. S. Howlett RADIO AIR SERVICE CORPORATION Cleveland, Ohio
W I B O	1 K W 1½ K W LS	Alvin E. Nelson NELSON BROS. BOND & MORTGAGE COMPANY Chicago, Illinois
W I B W	1 K W	Charles A. Sessions TOPEKA BROADCASTING ASSOCIATION Topeka, Kansas

<u>STATION</u>	<u>POWER</u>	<u>NAME AND ADDRESS</u>
W J A C *	100 W.	P. M. Price, President JOHNSTOWN AUTOMOBILE COMPANY 101 Main Street Johnstown, Pennsylvania
W J A R	250 W. 400 W. LS	Joseph S. Gettler THE OUTLET COMPANY Providence, Rhode Island
W J A S	1 K W 2½ K W LS	H. J. Brennan PITTSBURGH RADIO SUPPLY HOUSE Pittsburgh, Pennsylvania
W J B E *	50 W.	James F. Hopkins JAMES F. HOPKINS INCORPORATED Hotel Fort Shelby Detroit, Michigan
W J R *	5 KW	Leo Fitzpatrick WJR, THE GOODWILL STATION INCORPORATED Fisher Building Detroit, Michigan
W J S V *	10 K W	Col. Charles L. Stengle INDEPENDENT PUBLISHING COMPANY Alexandria, Virginia
W J Z	30 K W	A. L. Ashby, Vice President & General Atty NATIONAL BROADCASTING COMPANY INC. 711 Fifth Avenue New York, N. Y.
W K B N *	500 W.	Warren P. Williamson, jr. WKBN BROADCASTING COMPANY 17 No. Champion Street Youngstown, Ohio
W K Z O *	1 K W	J. E. Fetzer, President WKZO INCORPORATED Berrien Springs, Michigan
W L D W	500 W. 1 K W LS	Leigh E. Ore RADIO-WIRE PROGRAM CORPORATION OF AMERICA Oil City, Pennsylvania
W L S	5 K W	Edgar L. Bill, Director AGRICULTURAL BROADCASTING COMPANY Chicago, Illinois
W L W	50 K W	Powel Crosley, jr CROSLEY RADIO CORPORATION Cincinnati, Ohio



<u>STATION</u>	<u>POWER</u>	<u>NAME AND ADDRESS</u>
W M A Q	5 K W	William S. Hedges, President W M A Q INCORPORATED Daily News Plaza Chicago, Illinois
W M T	500 W.	Harry Shaw WATERLOO BROADCASTING COMPANY Waterloo, Iowa
W N A C	1 K W	John Shepard III SHEPARD BROADCASTING SERVICE INC. Boston, Massachusetts
W N A X	1 K W	J. C. Gurney HOUSE OF GURNEY INCORPORATED Yankton, South Dakota
W N D H *	100 W.	Irving Vermilya NEW BEDFORD BROADCASTING COMPANY New Bedford, Massachusetts
W O A I	50 K W	J. C. Cummings SOUTHERN EQUIPMENT COMPANY San Antonio, Texas
W O C - W H O.	5 K W	Dr. Frank W. Elliott CENTRAL BROADCASTING COMPANY Davenport, Iowa
W O L *	100 W.	Leroy Mark, President AMERICAN BROADCASTING COMPANY Annapolis Hotel Washington, D. C.
W O R	5 K W	A. J. McCosker BAMBERGER BROADCASTING SERVICE INC. 1440 Broadway New York, N. Y.
W O R C - * W E P S	100 W.	Alfred F. Kleindienst 60 Franklin Street Worcester, Massachusetts
W O W	1 K W	Orson Stiles WOODMEN OF THE WORLD LIFE INSURANCE ASSN Omaha, Nebraska
W P G	5 K W	Edwin M. Spence WPG BROADCASTING CORPORATION Atlantic City, New Jersey
W P T F	1 K W	H. K. Carpenter, General Manager DURHAM LIFE INSURANCE COMPANY Raleigh, North Carolina

<u>STATION</u>	<u>POWER</u>	<u>NAME AND ADDRESS</u>
W R A K *	50 W.	Clarence R. Cummins Williamsport, Pennsylvania
W R C *	500 W.	Frank M. Russell, Vice President NATIONAL BROADCASTING COMPANY INC. Washington, D. C.
W R E C *	500 W. 1 K W LS	H. B. Wooten WREC INCORPORATED Hotel Peabody Memphis, Tennessee
W R H M	1 K W	Dr. T. S. Miller MINNESOTA BROADCASTING CORPORATION Minneapolis, Minnesota
W R V A	5 K W	C. T. Lucy LARUS & BROTHER COMPANY INC. Richmond, Virginia
W S B	5 K W	Lambdin Kay ATLANTA JOURNAL COMPANY Atlanta, Georgia
W S M	5 K W	C. R. Clements NATIONAL LIFE & ACCIDENT INSURANCE CO Nashville, Tennessee
W S M B *	500 W.	H. Wheelahan SAENGER THEATRE INC. & MAISON BLANCHE CO New Orleans, Louisiana
W S P A *	100 W. 250 W. LS	Virgil V. Evans VOICE OF SOUTH CAROLINA Spartanburg, South Carolina
W T A G	250 W.	J. J. Storey WORCESTER TELEGRAM PUBLISHING COMPANY Worcester, Massachusetts
W T A M	50 K W	W. W. Smith NATIONAL BROADCASTING COMPANY INC. Cleveland, Ohio
W T A X *	100 W.	Carlin Baker, Secretary WTAX INCORPORATED 416 East Capitol Avenue Springfield, Illinois
W T I C	50 K W	Paul W. Morency, General Manager TRAVELERS BROADCASTING SERVICE Hartford, Connecticut

<u>STATION</u>	<u>POWER</u>	<u>NAME AND ADDRESS</u>
W T M J	1 K W 2½ K W LS	Walter J. Damm, Promotion Manager MILWAUKEE JOURNAL Milwaukee, Wisconsin
W T O C *	500 W.	W. T. Knight, jr. SAVANNAH BROADCASTING COMPANY De Soto Hotel Savannah, Georgia
W W J	1 K W	J. B. Webb EVENING NEWS ASSOCIATION Detroit, Michigan
K D Y L	1 K W	Philip G. Lasby INTERMOUNTAIN BROADCASTING CORPORATION Salt Lake City, Utah
K E C A	1 K W	PACIFIC DEVELOPMENT RADIO COMPANY 1000 S. Hope Street Los Angeles, California
K F A B	5 K W	Charles Stuart KFAB BROADCASTING COMPANY Lincoln, Nebraska
E F E L	500 W.	Eugene P. O'Fallon EUGENE P. O'FALLON INCORPORATED Denver, Colorado
K F I	5 K W	Earle C. Anthony EARLE C. ANTHONY INCORPORATED Los Angeles, California
K F J D	100 W. 250 W. LS	E. N. Peak MARSHALL ELECTRIC COMPANY Marshalltown, Iowa
K F J I *	100 W.	George Kincaid, Manager KFJI BROADCASTING INC. 176 Fourteenth Street Astoria, Oregon
K F N F	500 W. 1 K W LS	F. E. Tunnicliff HENRY FIELD SEED COMPANY Shenandoah, Iowa
K F S D	500 W. 1 K W LS	Leslie Adams AIRFAN RADIO CORPORATION San Diego, California



<u>STATION</u>	<u>POWER</u>	<u>NAME AND ADDRESS</u>
K F V D	250 W.	John W. Swallow LOS ANGELES BROADCASTING COMPANY Culver City, California
K F V S *	100 W.	Oscar C. Hirsch HIRSCH BATTERY & RADIO COMPANY Cape Girardeau, Missouri
K F Y R	1 K W 2 $\frac{1}{2}$ K W LS	P. J. Meyer MEYER BROADCASTING COMPANY Bismarck, North Dakota
K G D Y *	100 W.	George W. Wright VOICE OF SOUTH DAKOTA Huron, South Dakota
K G I R	500 W.	E. D. Craney K G I R INCORPORATED Butte, Montana
K G W	1 K W	C. O. Chatterton THE OREGONIA PUBLISHING COMPANY Portland, Oregon
K H J	1 K W	Don Lee DON LEE INCORPORATED Los Angeles, California
K J D S	100 W.	Ralph R. Drumton, General Manager JULIUS DRUMTON & SONS COMPANY San Francisco, California
K J R *	5 K W	R. A. Provine, Treasurer NORTHWEST BROADCASTING COMPANY Seattle, Washington
K M D C	1 K W	Arthur D. Church MIDLAND BROADCASTING COMPANY Kansas City, Missouri
K M O X	50 K W	George Junkin VOICE OF ST. LOUIS St. Louis, Missouri
K N X	5 K W	Naylor Rogers WESTERN BROADCAST COMPANY Hollywood, California
K O I N	1 K W	C. R. Hunt KOIN INCORPORATED Portland, Oregon

<u>STATION</u>	<u>POWER</u>	<u>NAME AND ADDRESS</u>
K O M O	1 K W	O. D. Fisher FISHER'S BLEND STATION INCORPORATED Seattle, Washington
K P O	5 K W	J. W. Laughlin HALE BROTHERS STORES INC. & THE CHRONICLE PUBLISHING COMPANY San Francisco, California
K Q V *	500 W.	Dyron A. Stump K Q V BROADCASTING COMPANY Pittsburgh, Pennsylvania
K S T P	10 K W	Stanley E. Hubbard NATIONAL BATTERY BROADCASTING COMPANY St. Paul, Minnesota
K T S M	100 W.	W. S. Dledsoe and W. T. Blackwell El Paso, Texas
K V O O	5 K W	H. A. Hutchinson SOUTHWESTERN SALES CORPORATION Tulsa, Oklahoma
K W C R *	100 W.	Harry F. Paar CEDAR RAPIDS BROADCASTING COMPANY Cedar Rapids, Iowa
		ELECTRICAL RESEARCH PRODUCTS INC. 250 W. 57th Street New York, N. Y.
NEW		JOHN V. L. HOGAN 41 Park Row New York, N. Y.
NEW		NEVILLE O'NEILL INC. Chrysler Building New York, N. Y.
NEW		I. C. Stoll, President RADIO BROADCASTERS OF AMERICA 113 West 42d Street New York, N. Y.
NEW		Raymond Bill RADIO DIGEST 420 Lexington Avenue New York, N. Y.

<u>STATION</u>	<u>POWER</u>	<u>NAME AND ADDRESS</u>
		SCOTT HOWE BOWEN INC. Chrysler Building New York, N. Y.
NEW		P. L. Thomson, Director of Public Relations WESTERN ELECTRIC COMPANY 195 Broadway New York, N. Y.
		P. L. Deutsch WORLD BROADCASTING SYSTEM Fuller Building New York, N. Y.
- - -		
<u>Omitted through error</u>		
W O K O	500 W.	Harold E. Smith Station W O K O WOKO Incorporated Albany, New York
K G I W	100 W.	Leonard E. Wilson Trinidad, Colorado
K W K	1 K W	Thomas G. Convey GREATER ST. LOUIS BROADCASTING CO St. Louis, Missouri
- - -		

\* New members since November 19, 1930  
NEW - since November 19, 1930



THE NATIONAL ASSOCIATION OF BROADCASTERS

NON-COMMERCIAL MEMBERS

AS OF MARCH 19, 1931

- - -

<u>STATION</u>	<u>POWER</u>	<u>NAME AND ADDRESS</u>
W A W Z *	250 W.	Ray B. White PILLAR OF FIRE Zarephath, New Jersey
W C A J	500 W.	I. B. Schreckengast, President NEBRASKA WESLEYAN UNIVERSITY Lincoln, Nebraska
W C O, A	500 W.	John E. Frenkel, Manager CITY OF PENSACOLA Pensacola, Florida
W E A O	750 W.	R. C. Higgy, Director-Manager OHIO STATE UNIVERSITY Columbus, Ohio
W E W.	1 K W	William V. Doyle, Director ST. LOUIS UNIVERSITY St. Louis, Missouri
W H A D *	250 W.	Rev. A. H. Poetker, Director MARQUETTE UNIVERSITY Milwaukee, Wisconsin
W I L L	250 W. 500 W. LS	Joseph F. Wright, Manager UNIVERSITY OF ILLINOIS Urbana, Illinois
W J B U	100 W.	George A. Irland, Manager BUCKNELL UNIVERSITY Lewisburg, Pennsylvania
W K A R	1 K W	R. J. Baldwin, Chairman MICHIGAN STATE COLLEGE Lansing, Michigan
W L B - W G M S	1 K W	UNIVERSITY OF MINNESOTA Minneapolis, Minnesota
W L C I	50 W.	William M. Horn, Pastor LUTHERAN ASSOCIATION OF ITHACA Ithaca, New York

<u>STATION</u>	<u>POWER</u>	<u>NAME AND ADDRESS</u>
W M B I	5 K W	H. C. Cromwell, Manager MOODY BIBLE INSTITUTE OF CHICAGO Chicago, Illinois
W O I	5 K W	W. I. Griffith, Manager IOWA STATE COLLEGE Ames, Iowa
W O S	500 W.	C. P. Anderson, Manager STATE OF MISSOURI MARKETING BUREAU Jefferson City, Missouri
W S S H	500 W.	Stanley M. Lane, Manager TREMONT TEMPLE BAPTIST CHURCH Boston, Massachusetts
W S U I	500 W.	UNIVERSITY OF IOWA Iowa City, Iowa
W T A W	500 W.	F. C. Bolton, Director AGRICULTURAL AND MECHANICAL COLLEGE College Station, Texas
C F R C		S. C. Morgan, Manager QUEENS UNIVERSITY Kingston, Ontario, Canada
C K U A		H. P. Brown, Studio Director UNIVERSITY OF ALBERTA Edmonton, Alberta, Canada
K F G Q	100 W.	J. C. Crawford BOONE BIBLICAL COLLEGE & ASSOCIATED INST. Boone, Iowa
K F K U	500 W.	Harold Tugham UNIVERSITY OF KANSAS Lawrence, Kansas
K F S G	500 W.	ECHO PARK EVANGELISTIC ASSOCIATION Los Angeles, California
K F U O	500 W. 1 K W LS	CONCORDIA THEOLOGICAL SEMINARY St. Louis, Missouri
K G E F	1 K W	TRINITY METHODIST CHURCH Los Angeles, California
K O A C	1 K W	W. L. Kadderly OREGON STATE AGRICULTURAL COLLEGE Corvallis, Oregon

<u>STATION</u>	<u>POWER</u>	<u>NAME AND ADDRESS</u>
K P O F *	500 W.	Roy B. White PILLAR OF FIRE Denver, Colorado
K T B I	1 K W	C. E. Fuller BIBLE INSTITUTE OF LOS ANGELES Los Angeles, California
K U S D	500 W. 750 W. LS	UNIVERSITY OF SOUTH DAKOTA ELECTRICAL ENGINEERING DEPARTMENT Vermillion, South Dakota
K W S C	1 K W 2 K W LS	F. F. Nalder STATE COLLEGE OF WASHINGTON Pullman, Washington

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\* New members since November 19, 1930.

# BROADCASTERS' NEWS BULLETIN

Reporting accurately and promptly current happenings of special interest to Broadcasting  
Stations in the Commercial, Regulatory, Legislative and Judicial Fields

Issued by

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## THE NATIONAL ASSOCIATION OF BROADCASTERS

Incorporated  
NATIONAL PRESS BUILDING  
WASHINGTON, D. C.

Telephone District 9497

## EXECUTIVE PERSONNEL

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Managing Director  
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OLIVINE FORTIER  
Secretary

### NAB ASKS CHANGES IN G. O. NO. 106

The National Association of Broadcasters has filed the attached brief with the Federal Radio Commission embodying suggestions for certain changes in the terms of General Order No. 106 with a view to simplifying and clarifying the order.

The order makes compulsory the keeping of program and operating logs by each station. Originally it was to become effective on March 1, 1931, but at the request of the National Association of Broadcasters its effective date was postponed until April 30, 1931.

The National Association of Broadcasters is in sympathy with the requirement that stations shall keep logs, if for no other purpose than for their own protection, but believes, as is set forth in the attached brief, that the value of such logs depends almost entirely upon their being kept in a clear and uniform manner. Furthermore, the requirement should not involve material changes from the normal methods of station operation nor impose additional expense on broadcasting stations.

The suggestions contained in the brief will not change the object sought to be achieved by the Commission in promulgating the order and will aid materially in its enforcement.



BEFORE THE  
FEDERAL RADIO COMMISSION

SUGGESTIONS  
of the  
NATIONAL ASSOCIATION OF BROADCASTERS  
for  
CLARIFICATION OF GENERAL ORDER NO. 106

The National Association of Broadcasters respectfully presents the following specific suggestions with a view to the clarification of General Order No. 106, and also with a view to making compliance with the terms of this order less onerous, particularly for small broadcasting stations with very limited personnel.

1. The National Association of Broadcasters is wholly in sympathy with the requirement that two logs shall be maintained by each broadcasting station, but it points out that the value of such logs depends almost entirely upon their being kept in a clear and uniform manner. The Association also points out that if the requirements for keeping such logs involve material changes from the normal methods of station operation, it would inevitably follow either that the logs would not be kept in accordance with the regulations of the Federal Radio Commission or else a real burden of additional expense will be imposed on many broadcasting stations.

2. The first requirement for the program log is as follows:

An entry of all stations and call announcements and the time made.

Presumably this contains a typographical error in respect to the word "stations." It is suggested, however, that this clause should read as follows:

An entry of the exact time of making each announcement of the call letters of the station.

3. The second requirement for the program log is as follows:

An entry describing each program broadcast with the time beginning and ending. If phonograph records or electrical transcriptions are used that fact shall be noted, together with the announcement made thereof.

It is our belief that unless this requirement is clarified the entries in the various station logs will be widely different, and in many cases quite meaningless. This is largely because of the indefinite character of the word "describing." It is, therefore, suggested that this paragraph be revised to read as follows:

An entry indicating the general character of each program broadcast, with the time of beginning and ending. Each entry shall indicate whether the program is (a) commercial or non-commercial; (b) studio, chain or outside pick-up; (c) principally music or principally speech. For each program using phonograph records or electrical transcription the fact shall be noted, and a special entry shall be made giving the exact time at which the announcement specifying the use of phonograph records or electrical transcription was given.

4. Regarding the operating log, it appears that the requirements of Paragraphs "A", "B", and "C" are entirely reasonable and should be adhered to as a matter of course by every broadcasting station.

5. Section "D" requires certain entries to be made every thirty minutes. For the station operating on full time schedule this would require as many as 36 entries daily, each entry consisting of three items, or 108 items per day. As a matter of practical experience it does not appear that nearly so many entries are required in order to provide a thoroughly accurate check on what the station is doing. In view of the fact that material fluctuations every half-hour are most improbable there is real danger that if the entries are required too often, they will in many cases be made perfunctorily, and often without any real reading of the indicators. Accordingly, it is suggested

that these entries should be required every two hours before local sunset, and every hour after local sunset, as it is only during the period of darkness that interference develops to a serious extent.

6. The order as issued states that:

These logs shall be kept by the person or persons competent to do so having actual knowledge or information of the facts herein required, who shall sign the log when coming on duty and again when going off duty.

This is entirely feasible for the operating log, but may involve serious difficulties for the program log. In many stations the announcer on duty is the person immediately and directly responsible, and frequently he may be absent from the principal studio handling a remote control broadcast. For example, many broadcasting stations are broadcasting reports of baseball games for two hours every afternoon six months of the year. The person in charge of these broadcasts is probably at the ball park, and in no position to carry around the station log and sign it when coming on duty and again when going off duty. Taking into consideration the practical requirements of a broadcasting schedule, it seems desirable that this section should be revised to read as follows:

The program log shall be kept under the direct supervision of the program manager of the station, who shall be held personally responsible for the accuracy of all entries therein, and such entries shall, whenever practicable, be initialed by the individuals actually in personal charge of the program. The operating log shall be kept under the direct supervision of the chief operating engineer of the station, who shall be held personally responsible for the correctness of all entries contained therein, and such entries shall, in every case, be initialed by the person actually in charge of the operation of the transmitter at the time each entry is made.

7. It is believed that with these changes the order will be far clearer than it is at present, and also that compliance with it shall impose less of a burden on the individual broadcasting stations.

Respectfully submitted,

NATIONAL ASSOCIATION OF BROADCASTERS

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Philip G. Loucks, Managing Director