



REPORT
OF THE
PBS EDITORIAL
STANDARDS REVIEW
COMMITTEE

June 14, 2005

**REPORT OF THE
PBS EDITORIAL STANDARDS REVIEW COMMITTEE
TO THE BOARD OF DIRECTORS
OF THE PUBLIC BROADCASTING SERVICE**

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Board of Directors
Public Broadcasting Service
1320 Braddock Place
Alexandria, VA 22314

Re: Report of the PBS Editorial Standards Review Committee

Dear Board Members:

Please find enclosed for your review and consideration the Report of the PBS Editorial Standards Review Committee. The Report is the product of several months of careful review and reflection by the Committee on the current PBS Program Policies. The Report includes new Editorial Standards and Policies that the Committee proposes for adoption by PBS, together with the Committee's findings and recommendations to the Board.

You will note that the primary finding of the Committee is that the current PBS Program Policies are well-reasoned and clear, articulate enduring principles that encourage high-quality content and a wide range of programs and content, and embody high journalistic standards. The Policies have served PBS well over the years, as reflected in the strong public support consistently enjoyed by PBS. Accordingly, the Committee has determined that the Policies need only minimal changes to keep pace with changes in journalism, technology, and the roles of the respective players in the development and distribution of PBS content. Thus, the new "Editorial Standards and Policies" proposed by the Committee herein, and recommended for adoption by the Board, are designed to maintain the timeless principles embodied in the Policies while updating them to reflect evolving journalistic norms and technology.

The Committee wishes to state firmly its belief in the value and importance of PBS in today's vast media landscape, and to commend PBS, its content team, member stations, producers, and all those involved in public broadcasting on the work they do. We believe that public broadcasting bears a deep and significant responsibility to the public, and we encourage public broadcasting to remain mindful that the editorial decisions it makes every day are made in discharge of that responsibility.

The Committee also would like to acknowledge, and to express its deep appreciation for, the excellent work done by local public television stations in bringing public broadcasting content to the American people. We urge you to continue to work together with one another and with PBS, as you have done so successfully over the years, to promote the PBS mission to inform and engage citizens.

Very truly yours,

The PBS Editorial Standards Review Committee

PBS Editorial Standards Review Committee

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* Mr. Ibargüen served as the initial chair of the Committee until his resignation as Chairman of the PBS Board following his selection as President of the Knight Foundation. PBS is a grant recipient of the Knight Foundation.

Tom Rosenstiel, Director of the Project for Excellence in Journalism, was retained by PBS to serve as the Professional Advisor to the Committee.

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EXECUTIVE SUMMARY

BACKGROUND

In October 2004, the Chairman of the Board of Directors of the Public Broadcasting Service (“PBS”), in consultation with the President and CEO of PBS, appointed a special committee to review the PBS Program Policies (the “Policies” or the “PBS Policies”), which have been in place since April 1987.¹ The PBS Policies articulate the broad “constitutional” principles – such as quality, integrity, fairness, and accuracy – that serve as the foundation for PBS editorial decision-making.

The PBS Editorial Standards Review Committee (the “Committee”) was convened in January 2005 and includes outside journalists and PBS member station leaders. The Committee’s charge was to:

1. Review the PBS Program Policies to determine whether they:
 - Accurately describe the principles that guide the PBS programming process and the roles and responsibilities of producers, PBS, and local public television stations in that programming process;
 - Continue to reflect accepted journalistic standards; and

¹ A copy of the 1987 PBS Program Policies is included as Attachment 2 hereto.

- Should be amended to reflect PBS’s growing use of non-broadcast technologies, such as the Internet, to distribute editorial content.
2. Review PBS’s actions in response to the recommendations of the 1986/1987 Special Committee on Program Policies and Procedures.
 3. Make such recommendations to the PBS Board of Directors as may be warranted by the above review.

The purpose of the Committee’s review was to ensure that the PBS Policies keep pace with changes in journalism, technology, and the roles of producers, PBS, and local public television stations in the development and distribution of public television programming and other content. Such a review is in keeping with the intent of PBS and the previous committee, which recommended periodic review of PBS’s policies and procedures “to assure they remain current and continue to encourage program quality, integrity, and diversity.” It has been 18 years since the last formal review of PBS’s Policies in 1987. The 1987 review occurred some 16 years following the original adoption of PBS’s program standards and journalism guidelines in the early 1970s.²

To fulfill its charge, the Committee reviewed not only the PBS Policies but also the report to the PBS Board that accompanied the Policies when they were proposed to the Board for adoption in 1987.³ In addition, the Committee reviewed the journalism standards of a number of media organizations, public television stations, and other public television producers. It reviewed PBS co-production, funding, and online production guidelines. The Committee heard presentations on PBS, pbs.org, PBS’s responses to the

² “Statement of Policy on Program Standards,” (1971); “Document of Journalism Standards and Guidelines,” (1972).

³ “Report of the Special Committee on Program Policies and Procedures to the PBS Board of Directors, April 15, 1987.”

recommendations of the 1987 Special Committee, and on the role of the Corporation for Public Broadcasting (“CPB”) in the public broadcasting system. The Committee reviewed recent public opinion polls on PBS. In addition, the Committee reviewed a paper from the Professional Advisor analyzing the issues he identified for consideration by the Committee in updating the Policies. Finally, the Committee requested and received copies of two PBS programs for review.⁴

FINDINGS

1. After completing its review, the Committee concludes that PBS’s Program Policies are well-reasoned and clear, articulate enduring principles that encourage high-quality content and a wide range of information, opinion, and artistic expression, and embody high journalistic standards. To reflect that sentiment, the Committee determined during its deliberations that the Policies need only minimal changes and should be altered only as necessary to reflect evolving technology and journalistic norms.

2. That said, after 18 years, the Committee finds that some updating is required. The first change is that the Policies should be “platform neutral” rather than focused exclusively on broadcast television programming. This means that the Policies should be amended to describe the editorial standards applicable to all PBS content, not just television programming, recognizing the multi-media nature of PBS content today and the likelihood that distribution of that content will expand to even more delivery systems in the future.

⁴ Attachment 3 hereto is a listing of the materials provided to the Committee for its review.

3. The Committee finds that the Policies should be revised to acknowledge the development and importance of the Internet and other new and emerging digital platforms and the possibilities they create to make PBS more responsive and accountable to the public.

4. The Committee finds that the Policies should be amended to reflect contemporary thinking about transparency in journalism and its implications for the meaning of objectivity.

5. The Committee finds that the Policies should be updated to reflect the roles and responsibilities of producers, PBS, and local stations with respect to online and other content; to recognize the Corporation for Public Broadcasting as a fourth entity in the public broadcasting landscape by virtue of its role in funding content, shielding public broadcasting from improper influence, and facilitating the development of public telecommunications content that meets prescribed standards; and to reflect the current usage by PBS and its member stations of the PBS logo.

RECOMMENDATIONS

1. Although the principles embodied in PBS's Policies are timeless, the Committee recommends that the PBS Board adopt the attached updated Editorial Standards and Policies, which are designed to further clarify the governing principles of PBS, to keep pace with changes in journalism and technology, and to better reflect the roles and responsibilities of producers, PBS, local public television stations, and the Corporation for Public Broadcasting in the development and distribution of public television content.

2. The Committee recommends that the Board establish a system for periodic review of PBS's Editorial Standards and Policies to ensure that review takes place more frequently than in the past. The sense of the Committee is that the period between the last formal review and the current review (*i.e.*, 18 years) was too long.

3. As part of the Committee's determination that transparency and responsiveness to the public should guide the updated PBS Standards and Policies, the Committee recommends that PBS consider creating an ombudsman position.

4. The Committee recommends that the Board formally recognize and state its intention to preserve the preeminence of the PBS Editorial Standards and Policies as the constitutional document governing PBS's content development and distribution processes.

5. The Committee further recommends that the Board take steps to broadly publicize its editorial standards and policies so that they will be widely understood by the various constituencies of public broadcasting – including the public, producers, local stations, the Corporation for Public Broadcasting, and policymakers – and that the Board promote them as “best practices” for use by producers and PBS member stations.

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A. INTRODUCTION

The context in which the PBS Editorial Standards Review Committee took up its work, including the changes in television and journalism that have occurred since the last formal review of the PBS Policies, is worth noting.

First, the public’s view of the media has changed significantly in the last 18 years. The first polls to identify declining trust of the news media were sponsored by the American Society of Newspaper Editors in the mid-1980s. For the last 18 years, most measures of the “believability” and “credibility” of the media (posed as two different sets of questions) have been declining. The same is true of a host of perhaps more penetrating indexes, including public perceptions of the morality, accuracy, intrusiveness, and motives of the news media, and even whether the news media are helping or hurting democracy.

In light of the above, it seems all the more important to the Committee that the document articulating PBS’s editorial standards be a statement of affirmation, in terms that are clarion and inspiring, of the principles that PBS content should reflect and to which it should aspire. Good journalism is born of skepticism, but it is also grounded in courage and a deep conviction about the purpose and significance of journalism in

creating a more democratic and transparent society, essential elements to ensure that the public is sovereign.

In 1987, when the PBS Policies were adopted, the commercial television networks had only recently begun to view their news divisions as profit centers. Prior to that time, news had served other functions, such as helping to establish the networks' brands and to fulfill regulatory licensing requirements.

In the years since, the audiences for network evening newscasts have dropped by nearly half. The number of correspondents has dropped by a third. The number of bureaus has been cut by half. The documentary about major public issues has nearly vanished. The prime time magazine has become, in the words of former PBS and NBC executive Lawrence Grossman, "non-fiction entertainment programming," with the possible exception of programs like "60 Minutes" and "Nightline" and occasional segments elsewhere. Each of the major commercial networks has undergone a change in ownership at least once. All of these developments bear, at least indirectly, on the task before the Committee of assessing the role of PBS in the media environment.

Against that background, it is worth noting the ways in which PBS now stands apart and differentiates itself from the modern culture of media, particularly television.

First is the quality of deep and thorough reporting, steeped in the traditions of documentary filmmaking, that characterizes a good deal of PBS's non-fiction content. PBS programming is distinguished in today's media environment for thinking seriously and thoroughly about subjects, searching out thoughtful sources and giving them the time to say what they mean. In the current climate of television, such long-form journalism about serious subjects has become increasingly scarce.

Second is that, when a point of view is expressed in a long-form work presented by PBS, that point of view is well documented. The analysis and interpretation in the journalism is grounded in factual reporting, not in the culture of argument and opinion that characterizes so much of the electronic media and, indeed, defines the trajectory of modern media generally.

Third is respect for the audience, and for the ability of the audience to think for itself.

Fourth is that PBS continues to take on subjects that the rest of the news media, particularly television, increasingly tends to avoid because of commercial imperatives. This is a crucial quality for a democratic society — that the media cast its searchlight on topics that are not popular, safe, familiar, or guaranteed to attract a crowd. This is something that the PBS Policies explicitly reference.

The Committee began its work with these and other characteristics of PBS in mind.

B. OVERVIEW OF THE PUBLIC BROADCASTING SERVICE

Public broadcasting in the United States is the sum of the activities and efforts of many independent entities, including public television stations, producers, funders, PBS, and others. Although the distribution of quality television programming remains the primary function of PBS, PBS also provides online content on www.pbs.org, educational materials, and other products and services. In all of its activities PBS follows four fundamental guiding principles:

- Editorial Integrity. Public television stations and PBS have been entrusted with operating an independent public television service on behalf of the American public. That trusteeship carries with it the obligation to ensure that PBS's programming and content development processes remain free from improper influences or political pressures and that PBS programs and other content satisfy the highest editorial standards.
- Quality. PBS is committed to providing high-quality programs and content that serve a wide variety of educational, informational, and cultural needs and interests. The goal of achieving quality encompasses a host of artistic, informational, journalistic, technical, and other considerations.
- Diversity. PBS is committed to promoting diversity – diversity of topics, producers, viewpoints, funders, and management – and believes that the public interest is best served by exposure to a wide variety of subjects and sources of information.
- Local Station Autonomy. PBS's programming role is premised upon preserving the preeminence of the local station. Because each station is uniquely qualified to respond to and serve the needs of the local community, local stations are the bedrock of public broadcasting.

1. **PBS in Brief**

PBS is a private, nonprofit corporation chartered in the District of Columbia. It is not a governmental agency; rather, it is a membership organization, the members of which are nonprofit community organizations, colleges/universities, and state and local

educational authorities that are licensees of noncommercial educational television stations throughout the United States. Founded in 1969, PBS's mission is to provide quality television programming and related services to its member stations.

2. **PBS Member Stations**

PBS's membership is comprised of 169 noncommercial, educational television licensees that operate 348 PBS member stations.⁵ Of the 169 licensees, 86 are community organizations, 57 are colleges/universities, 20 are state authorities, and 6 are local educational or municipal authorities.

Each public television licensee operates independently of PBS and of every other public television station licensee, and each retains sole discretion and responsibility for the programs it broadcasts. When PBS was created in 1969, its founders sought to ensure that local stations, responsive to the diverse needs of the communities they are licensed to serve, would retain ultimate control over their programming. Accordingly, unlike commercial networks, PBS is governed and funded by its member stations and does not produce the programming it distributes.

3. **PBS Governance**

The PBS Board of Directors is responsible for governing and setting policy for PBS. The vast majority of Board members are elected by PBS member stations and are station managers or lay representatives of stations.

⁵ The term "licensees" refers to the noncommercial entities authorized by the Federal Communications Commission to operate television broadcasting stations. In some cases, one licensee operates two or more television stations, in different communities. Subject to meeting certain criteria, these stations may qualify as independent "PBS member stations."

4. **PBS Budget**

PBS's operating revenue in fiscal year 2004 was \$333 million. The largest percentage of funding (47%) was obtained from station assessments, or dues. Other revenue sources included CPB and federal grants (24%); royalties, license fees, satellite services, and investment income (14%); educational product sales (12%); and other (3%). PBS expenses in fiscal year 2004 included programming and promotion (72%); member and educational services (15%); satellite interconnection and technical services (9%); and general and administrative (4%).

5. **The Public Broadcasting Audience**

PBS and its member stations reach nearly 90 million people each week through on-air and online content. The public broadcasting audience reflects the social and economic makeup of the United States.

6. **PBS Program and Content Development**

To foster an environment in which creative talents can operate freely, PBS program standards and policies from the beginning have envisioned a non-intrusive role for PBS in the programming process, acknowledging that primary responsibility for the content of programming distributed by PBS rests with the producing entity. While this freedom allows producers great latitude for innovation and creativity, it requires PBS to ensure content quality and conformity with PBS editorial standards in a system where that content is produced by persons not employed or controlled by PBS.

PBS is prohibited by its articles of incorporation from producing programs for broadcast (though it does, on occasion, produce content for distribution directly to the

public via digital platforms such as its Web site, www.pbs.org). Programs and other content distributed by PBS are obtained from PBS member stations, independent producers, and sources around the world. Although PBS influences and coordinates the overall initiation, funding, production, and scheduling of programs and other content, it does not seek to control the specific content created by its producers. PBS's essential responsibility is to serve as a gatekeeper on behalf of its member stations by evaluating content produced by others, judging based on its editorial policies and priorities whether to accept or reject content for distribution, and scheduling and distributing content for broadcast by its member stations or to the public directly via the Web. Thus, producers bear responsibility for content production decisions while PBS bears responsibility and discretion for deciding whether to accept and distribute content. PBS performs this function on behalf of its member stations and, ultimately, the audience.

The appearance of the PBS logo at the close of a program signifies the acceptance of a program for national distribution by PBS. Similarly, the availability of content on www.pbs.org signifies that it has been accepted by PBS for distribution via the Web. Programs or other content rejected by PBS will not be distributed with the PBS logo or on www.pbs.org and will not enjoy the benefits of PBS promotion, advertising, and other support. Rejection by PBS, however, does not prevent stations or public television distributors from seeking national distribution of a program or content. Among other distribution methods available to stations, the Public Broadcasting Act of 1967 requires that excess capacity on PBS's satellite distribution system be made available for the purpose of distributing programs to public television stations.

Thus, viewers should not assume that all programs broadcast on their local public television stations are PBS programs. Local stations ultimately make their own decisions about which programs to broadcast and when to schedule them, although many factors, including PBS's schedule, influence those decisions. On average, one-third of a public television station's broadcast schedule consists of programs obtained from sources other than PBS.

7. **PBS Program Services**

PBS offers multiple program services to its member stations and the public.

a) **The National Programming Service ("NPS")**

The NPS is the major package of programs that PBS distributes to its member stations. It features documentaries as well as arts, children's, and news and public affairs programming. The NPS provides nearly 1,200 hours of unduplicated primetime programming hours annually, including signature series such as **Frontline**, **American Experience**, **NOVA**, **Nature**, and **American Masters**, as well as a wide range of high-profile miniseries and specials. In addition, the NPS provides more than 260 hours of **The NewsHour with Jim Lehrer** and approximately 815 hours of children's programming, which do not air in primetime. The majority of the NPS schedule features ongoing PBS series, such as **NOVA** and **Masterpiece Theatre**. The remainder of the schedule is made up of limited series and specials obtained from a variety of sources, including member stations and independent producers.

b) **Optional Program Services**

In addition to the NPS, PBS member stations have the option to subscribe to other program services, enabling the stations to offer more programming and help meet local community needs. These services include:

i. **PBS Plus**, which provides over 600 unduplicated hours of fully underwritten continuing series, limited series, and specials in a variety of genres.

ii. **Station Independence Program**, which provides over 100 unduplicated hours of on-air programming as well as promotional materials and development tools to support on-air pledge drives and stations' overall fundraising efforts.

c) **PBS Channels**

PBS offers several 24-hour-a-day, seven-day-a-week packaged channels to member stations via digital multicast signals and in some cases via direct broadcast satellite.

i. **The PBS National Satellite Service** is a fulltime channel providing all current, nationally-scheduled NPS programs and most PBS Plus programs, available to the backyard dish (TVRO) audience. It also has signals available for station multicast use and in areas unserved by local stations via Dish Network and DirecTV.

ii. **PBS YOU** is a fulltime channel offering formal and informal educational programming, including college-credit telecourses, foreign language instruction, lifelong learning, and public affairs programming.

iii. **PBS Kids Channel** is a fulltime channel that provides preschool series and educational children's programming.

iv. **PBS HD Channel** is a fulltime channel offering hundreds of hours of public television programming in a full, widescreen, high-definition format.

8. **Station Oversight of Program Content**

A committee of the PBS Board made up of station managers and lay representatives provides ongoing oversight and governance of the NPS, including approving an annual content strategy. Other station managers and programmers have significant input into determining which programs are included in the NPS. A number of different committees of station representatives, independent producers, and others meet regularly to discuss every aspect of the programming service.

9. **Beyond the Screen**

From its beginnings as a provider of television programs that educate through entertainment, PBS has expanded its mission beyond the screen to offer a range of services that provide learning and enrichment activities for all ages.

a) **www.pbs.org**, the PBS Web site, is one of the most visited dot-org Web sites in the world. It is also the home of comprehensive companion Web sites for more than 1,300 PBS television programs and specials, as well as original Web content. With more than 175,000 pages of content to explore, visitors to pbs.org can delve further into subjects of interest — from news to history and the arts to science and technology. Pbs.org furthers the public broadcasting commitment to lifelong learning through supersites such as **PBS Kids**, **PBS Parents**, **PBS TeacherSource**, and **PBS Campus**.

Pbs.org also connects directly to local public broadcasting member stations through the PBS Station Finder and the opportunity to customize the pbs.org experience

with local member stations. Visitors can browse television schedules, explore local content, and consult the online offerings of over 300 stations across the country.

b) **PBS Video** distributes video to both consumers and the educational market. PBS distributes video to consumers via relationships with major retailers nationwide. PBS also has a direct-to-consumer business that includes mailing eight million catalogs annually to homes, and an e-commerce Web site at **www.shoppbs.org** that receives more than 550,000 visitors per month. For distribution to the educational market, PBS maintains direct relationships with schools and libraries, mailing more than one million catalogs annually.

c) **PBS Ready To Learn** is an innovative early learning partnership between PBS and the United States Department of Education. Ready To Learn integrates free and universally available children's educational television and online resources with community outreach to help parents and educators prepare young children for success in school.

d) **PBS TeacherSource**, an online neighborhood for preK-12 educators, extends the educational value of PBS's programming by helping teachers learn effective ways to incorporate video and the Web in the classroom. PBS TeacherSource includes more than 4,500 free lesson plans, teachers' guides, and online activities — all correlated to more than 230 sets of national and state curriculum standards.

e) **PBS TeacherLine** provides innovative, Web-based professional development to prepare preK-16 educators for teaching and learning in a digital environment. TeacherLine is aligned with state and national standards in mathematics

and technology and offers a flexible, modular, customizable format for “anytime, anywhere” professional development.

C. FINDINGS

As a result of its review, the PBS Editorial Standards Review Committee arrived at the following Findings, which form the basis for its proposed revisions to the existing PBS Policies:

1. PBS’s Program Policies are well-reasoned and clear, articulate enduring principles that encourage high-quality content and a wide range of information, opinion, and artistic expression, and embody high journalistic standards. To reflect that sentiment, the Committee determined during its deliberations that the Policies need only minimal changes and should be altered only as necessary to reflect evolving technology and journalistic norms.

The first charge to the Committee was to review the PBS Policies to determine whether they accurately describe the principles that guide the PBS programming process and the roles and responsibilities of producers, PBS, and local television stations in that programming process. The Committee was also charged with determining whether the Policies reflect accepted journalistic standards. The Committee was then to determine whether the Policies should be amended to reflect PBS’s growing use of non-broadcast technologies, such as the Internet, to distribute editorial content.

In general, the Committee was impressed by the PBS Policies. Given that they were produced nearly 20 years earlier, they struck the Committee as remarkably contemporary in tone and reflective of a deep understanding of the editorial challenges facing PBS. To express that sentiment, and to avoid the impression of something being broken, the Committee felt it should propose changes to the Policies only where necessary.

Indeed, as the Committee reviewed not only the PBS Policies but also the accompanying report,⁶ which explained the thinking and review that went into the Policies in 1987, it was struck by how thorough and how contemporary the previous committee's reasoning seems nearly two decades later.

It is worth noting, for instance, what the 1987 Report described as important issues then facing PBS. One of those identified was “greater opportunities to respond to programs and present diverse views,” a concept that seems to have anticipated the Internet as well as other possibilities for presenting content offered by new digital technologies. The 1987 Report went on to explain that “[t]he Committee believes the proper response to controversy over program content is not to suppress controversial views, but to open wider the channels of communication. Therefore, the Committee recommends that PBS solicit the assistance of public television's most creative producing and programming minds to develop ways to broaden the range of discourse about PBS programs and to present information and opinions about topics presented in PBS programs.” Those sentiments, broadened to include new technology, seem equally relevant today.

The 1987 Report also was explicit in addressing the question of shielding public broadcasting from improper influence or political pressure. It stated:

- “The Committee also believes that, if PBS policies and procedures are to embody high journalistic standards, PBS must not allow funders, or others who improperly seek to influence program content, to assume any editorial role in the program

⁶ “Report of the Special Committee on Program Policies and Procedures to the PBS Board of Directors, April 15, 1987” (the “1987 Report”).

production process. Furthermore, PBS must firmly resist political pressure, threats, or intimidation.”

- “Improper attempts to intrude on the editorial process, if not successfully resisted, undermine the credibility and integrity of public television’s service. While PBS’s funding guidelines have been effective in preventing such improper editorial involvement by program funders, special issues are raised when the funder dispenses federally-appropriated funds.”
- “Over the years, some have invoked the ‘objectivity and balance’ provision of the Public Broadcasting Act as a substantive standard to which public broadcasting programs should be held. The Committee is persuaded that Congress did not intend the Corporation for Public Broadcasting, or anyone else, to use ‘objectivity and balance’ as a substantive standard, or as a justification either for involvement in the editorial process or for after-the-fact review of program content. Rather the language reflects a more fundamental Congressional concern: that public broadcasting not become or be perceived to be the agent of any political faction and that CPB scrupulously avoid any politicization of its processes.”

These issues have not evaporated in the years since the PBS Policies were adopted and, instead, remain relevant today.

2. After 18 years, the Committee finds that some updating is required. The first change is that the Policies should be “platform neutral” rather than focused exclusively on broadcast television programming. This means that the Policies should be amended to describe the editorial standards applicable to all PBS content, not just television programming, recognizing the multi-media nature of PBS content today and the likelihood that distribution of that content will expand to even more delivery systems in the future.

The most extensive changes to the Policies recommended by the Committee relate to ensuring that the Policies encompass the widest possible variety of content delivery systems, including those that are emerging now and those yet to emerge. Accordingly, in most instances where the Policies refer to “programs” or “programming,” the Committee suggests changing the reference to “content.” Likewise, the Committee suggests generally changing the word “viewers” to “audience.”

While such changes might strike some observers as unnecessary — PBS today is still largely a television broadcaster — increasingly over time the range of content delivery systems will expand. At the core of PBS is its commitment to the quality and integrity of editorial content in whatever form it is delivered.

The Committee does not suggest that the proposed new Standards and Policies should focus on the Internet or the Web in particular. In time, the delivery systems for PBS content may spread to a range of digital platforms, from phones, PDAs, and I-Pods to other platforms yet to be imagined. To make the new Standards and Policies as enduring as possible, the new document should concentrate on the values, principles, and standards of PBS. Those are the heart of PBS, not the notion of broadcast waves carried through the air.

3. The Committee finds that the Policies should be revised to acknowledge the development and importance of the Internet and other new and emerging digital platforms and the possibilities they create to make PBS more responsive and accountable to the public.

To this end, the Committee suggests the addition of a new subsection in the Standards and Policies entitled “Responsiveness to the Public.” This new section instructs that content producers have a responsibility “to respond to and interact with the public.” The Committee feels that not only is this kind of responsiveness and interaction

made increasingly possible by new technology, but also it is consistent with the expectations of audiences in the new media culture and serves to enhance the accuracy of any organization engaged in producing news and information. An editorial organization that fails to interact with the public will be perceived as arrogant and will tend to become isolated.

While it would be unwise for the Standards and Policies to outline precisely how producers should respond to and interact with audiences, some general guidance and direction seem warranted. Thus, the proposed Standards and Policies explain that this interaction “may include providing an outlet for public feedback about content and helping to create material for the Web that allows audiences to learn more, seek background information, access documents alluded to in a program, answer questions that a program might not have been able to address, and even customize information. Accountability is a goal, including answering audience questions and responding to criticisms about programs or content.”

Although the broad articulation of PBS’s editorial standards cannot anticipate precisely how the standards will or should be implemented, the Committee believes that clarity and transparency are needed to guide how public responsiveness is sought. When public feedback is published by PBS, the proposed Standards and Policies instruct that it should be labeled as such and that standards for publication — such as those relating to obscenity or personal attacks — should be clearly communicated.

4. The Committee finds that the Policies should be amended to reflect contemporary thinking about transparency in journalism and its implications for the meaning of objectivity.

The Committee feels that the section on “Objectivity” in the PBS Policies requires substantial updating. The problem is not that the concept of objectivity itself is naïve or obsolete, or that journalism should abandon it; quite the opposite is true. The problem, rather, is that few concepts in journalism are more confused or muddled in people’s minds than the term “objectivity.”

Some observers believe that “objectivity” implies that journalists have no points of view, predilections, or opinions concerning the subject matter of their reporting. Those who adopt that meaning are prone to dismiss the notion of objectivity as deluded and impossible. While this critique of the concept of objectivity is hardly new — it can be dated back to criticisms written 70 years ago — it seems to have become more common in recent years as the number of outlets for information has increased.

Other critics define “objectivity” narrowly to mean simply neutrality. The problem with this definition is that it may describe some kinds of journalism, but it fails to encompass the demands on modern media to offer context, analysis, or synthesis to the news. As far back as 1947, the Hutchins Commission on Freedom of the Press, in explaining the need for the news media to put the accounts of the day’s events “in a context which gives them meaning,” declared: “It is no longer enough to report the fact truthfully. It is now necessary to report the truth about the fact.” The narrowest definition of objectivity fails to include journalism that offers this higher level of journalistic synthesis, interpretation, or analysis or that comes to any conclusions. Under that definition, the concept of objectivity could not be applied to watchdog reporting, or most long-form reporting that, with proper documentation, arrives at certain conclusions or a point of view. Nor could the term “objectivity” be applied to the wide realm of

scientific work that arrives at conclusions. This analogy to science and the academic realm is vital, because that is where the term “objectivity” originated. In science, “objectivity” applies to the methods, procedures, and open-minded spirit of the work, not to the idea that a work is merely descriptive and never normative or conclusive.

Indeed, a close reading of journalism history suggests that the concept of objectivity began to migrate from academia into journalism in the early 20th century precisely out of the recognition that journalists had biases that could color their collection of facts and inject unconscious bias into their reporting. The way to combat this, the original proponents of objectivity argued, was to develop a professional method of collecting and verifying the news that was clear, disciplined, and modeled in spirit on the scientific method. Walter Lippmann described it as a call for “a more scientific spirit” in journalism. In science, “objectivity” means something more concrete. An objective work is one that is produced according to agreed-upon principles and is sufficiently transparent that others can see how it was done and could, if they chose to replicate it, produce similar results.

In contemporary journalism, this original meaning of objectivity is regaining force. Indeed, the concept of transparency is guiding the reevaluation of policies at the top echelons of journalism, including the new policies at the *Washington Post*, the *New York Times*, and several other of the nation’s leading newspapers and television operations. The spirit of transparency is similarly guiding the development of journalism on the Internet and elsewhere.

The Committee wanted this concept of transparency to inform the new Standards and Policies throughout. In that spirit, the Committee has added the following phrase to

the Introduction to the proposed Standards and Policies, “the Committee believed that a hallmark for PBS in its approach and its content going forward should be transparency.”

The Committee similarly feels that transparency should be a central concept in the updating of the section on objectivity. The existing Policies declare that objectivity is required only of straight news reporting on PBS, stating that, “[w]hile PBS holds all news programs to this standard of objectivity, PBS recognizes that other program formats may not have the objective presentation of facts as their goal.”

The Committee suggests that the new Standards and Policies offer a broader, more thorough, and more contemporary understanding of objectivity, echoing back to the original intent and the meaning of the term in other realms of study, including the study of history and the sciences. Thus the following paragraph is proposed:

“Objectivity, however, encompasses more than news and information presented in a neutral way. It also refers to the process by which a work was produced, including work that involves analysis or, as a result of reporting, arrives at conclusions. To begin with, journalists must enter into any inquiry with an open mind, not with the intent to present a predetermined point of view. Beyond that, for a work to be considered objective, it should reach a certain level of transparency. In a broad sense, this spirit of transparency means the audience should be able to understand the basics of how the producers put the material together. For example, the audience generally should be able to know not only who the sources of information are, but also why they were chosen and what their potential biases might be. As another example, if producers face particularly difficult editorial decisions that they know will be controversial, they should consider explaining why choices were made so the public can understand. Producers should

similarly consider explaining to the audience why certain questions could not be answered, including why, if confidential sources are relied on, the producers agreed to allow the source to remain anonymous. And the spirit of transparency suggests that if the producers have arrived at certain conclusions or a point of view, the audience should be able to see the evidence so it can understand how that point of view was arrived at. One aspiration implicit in the idea of transparency is that an audience might appreciate and learn from content with which it also might disagree.”

The 1987 Report recognized that an important element in creating a diverse and balanced program service was making clear to the audiences the distinctions among different styles of content. For instance, in its discussion of controversial programs, the 1987 Report stated that, “PBS’s commitment to accept and present documentaries of all kinds carries with it a concomitant responsibility to distinguish, to the extent possible, among them, so that viewers will know what they are seeing and adjust their expectations accordingly. . . . Accepted broadcast journalism standards require clear and effective identification of the information offered in these programs, but do not require that they be stripped of their points of view.”

The notion of transparency that guides the updating of the Policies probably puts even higher importance on this kind of clear and effective identification. Accordingly, the proposed Standards and Policies include the following directive about identifying content that, beyond offering analysis in reporting, is essentially opinion and commentary:

“Opinion and commentary are different from news and analysis. When a program, a segment, or other content is devoted to opinion or commentary, the principle

of transparency requires that it be clearly labeled as such. Any content segment that presents only like-minded views without offering contrasting viewpoints should be considered opinion and should identify who is responsible for the views being presented.”

The existing PBS Policies also contain the statement that, “[n]ews reporting permits no room for personal bias or distortion by conscious manipulation of selected facts or other program elements.” The Committee believes that conscious manipulation of selected facts to express bias is inappropriate not only in news reporting, but in all types of content. Therefore, it suggests concluding the “Objectivity” section of the new Standards and Policies with this amended version of the idea: “No content distributed by PBS should permit conscious manipulation of selected facts in order to propagandize.”

5. The Committee finds that the Policies should be updated to reflect the roles and responsibilities of producers, PBS, and local stations with respect to online and other content; to recognize the Corporation for Public Broadcasting as a fourth entity in the public broadcasting landscape by virtue of its role in funding content, shielding public broadcasting from improper influence, and facilitating the development of public telecommunications content that meets prescribed standards; and to reflect the current usage by PBS and its member stations of the PBS logo.

a) Roles of producers, PBS, and local stations. In updating the Policies to apply to all PBS content, not simply programs, it became apparent that changes were necessary to the “Roles and Responsibilities” subsection in part because the roles of producers, PBS, and local stations have changed with the introduction of different kinds of PBS content. The proposed Standards and Policies define two primary categories of content now distributed by PBS: “Program Content,” which is television programming distributed by PBS to member stations and other parties (*e.g.*, cable and satellite operators) for distribution to the public via over-the-air broadcast, cablecast, and other

means; and “Online Content,” which is published directly to the public by PBS via digital platforms such as the PBS Web site, pbs.org.

As explained in the introduction to the proposed new Roles and Responsibilities section, “[t]he respective roles and responsibilities of producers, PBS, local public television stations, and CPB may differ in each context. For example, while PBS is responsible for reviewing, acquiring, commissioning, funding, scheduling, promoting, and distributing Program Content, PBS does not itself produce any Program Content. By contrast, PBS occasionally does produce Online Content.”

As a result, Program Content and most other content distributed by PBS are produced by people who are not employed by PBS and over whom PBS exercises no direct authority (although PBS does evaluate all content it distributes). This has always been the case. The concept is explained in the proposed Standards and Policies substantially as it was in the existing PBS Policies: “While producers bear responsibility for content production decisions, PBS bears responsibility and discretion for deciding whether to accept and distribute content”

What is new, however, is the concept of PBS as a producer – PBS occasionally produces Online Content. Therefore, when PBS produces Online Content, it assumes the role and responsibilities of a producer with respect to that content.

Similarly, the section of the Policies that describes the role of local stations requires updating to accurately describe the role of stations with respect to the different types of content. With respect to Program Content, every PBS member station makes its own decisions about which programs to air in fulfillment of its statutory obligation as a federally licensed broadcaster. Thus, the proposed Standards and Policies contain the

following language, substantially unchanged from the language in the PBS Policies: “While other entities, including PBS, may assist the local station in fulfilling those obligations, final responsibility for the quality and integrity of its broadcast service rests with each individual station. Thus, even though PBS has accepted Program Content and made it available to the local station, that station has sole discretion to decide whether and when to broadcast it.”

In addition, local stations may choose to air their own programs and obtain programs – including some rejected by PBS – from sources other than PBS. Thus, PBS’s decision not to distribute a program does not prevent the program from being broadcast on local public television stations.

The role of local stations with respect to Online Content, however, is different. The proposed Standards and Policies set forth the distinction as follows: “While PBS distributes Program Content through its member stations (which retain discretion to broadcast such Program Content or not), PBS distributes Online Content directly to the public, at all times and on a worldwide basis, through its Web site, www.pbs.org. Although pbs.org includes functionality that allows stations to associate their local brands with Online Content, a station cannot choose to limit its association to some but not all of the Online Content available on pbs.org. Pbs.org also provides access to local station information. PBS member stations make their own online content available to the public through their own independently-operated Web sites.”

b) New subsection on CPB. The Committee suggests adding CPB as a fourth entity with a role in the public broadcasting landscape, along with producers, PBS, and local stations. The Committee recognizes the important role of CPB as both a source of

funding for, and a shield to protect and preserve the independence and integrity of, public broadcasting.

The Committee finds that CPB plays an important role in public broadcasting and believes that it is useful for everyone to understand the responsibilities and parameters of that role. Thus, the proposed Standards and Policies add CPB to the list of players in public broadcasting. The new Standards and Policies explain that, “[t]he Corporation for Public Broadcasting (“CPB”) is a private, nonprofit corporation created by Congress in 1967 to distribute federally appropriated funds to public broadcasting organizations nationwide. To that end, each year CPB distributes Congressionally appropriated funds to local public broadcasting stations, PBS, and other public television distributors and producers.”

The Committee feels that it makes sense to reference directly the legislation that created CPB, the Public Broadcasting Act (47 U.S.C. § 396 *et seq.*), which authorizes CPB to “facilitate the full development of public telecommunications in which programs of high quality, diversity, creativity, excellence, and innovation, which are obtained from diverse sources, will be made available to public telecommunications entities, with strict adherence to objectivity and balance in all programs or series of programs of a controversial nature.” The proposed Standards and Policies explain that, “CPB is governed by a Board of Directors whose members are appointees selected by the President of the United States and confirmed for six-year terms by the U.S. Senate. To shield public television producers and distributors from political influence, the Public Broadcasting Act prohibits CPB from owning or operating public television stations and from producing or distributing public television programs. In addition, the Act requires

CPB to ‘carry out its purposes and functions and engage in its activities . . . in ways that will most effectively assure the maximum freedom of [public television] from interference with, or control of, program content or other activities.’”

c) PBS Logo. The existing PBS Policies repeatedly refer to the PBS logo as the identifier of programs accepted by PBS and to the withholding of the PBS logo as a symbol of rejection of a program by PBS. Because the ways in which the PBS logo is used has changed over the years, the Committee proposes that the new Standards and Policies reflect those changes.

In the Policies, and in the 1987 Report, the PBS logo is referred to as the “imprimatur” or symbol of acceptance by PBS of a program. At that time, it was PBS’s practice to put its logo on programs it accepted and to withhold the logo from programs it rejected. Thus, the appearance of the PBS logo signified PBS’s endorsement of a program’s overall quality and its compliance with PBS’s standards. The logo was used virtually exclusively as the imprimatur of PBS approval.

Today, PBS still places its logo at the end of a program to signify acceptance by PBS and withholds its logo from the end of a program if it does not accept the program for distribution. However, the PBS logo is used in other ways as well. For example, PBS now permits member stations to engage in “co-branding,” whereby a station may pair its logo with the PBS logo and use the composite as an on-screen “bug” that appears on all station broadcasts, and in other ways. The PBS logo might appear on a PBS member station’s Web site with the station’s logo, even in association with content not distributed or approved by PBS. The use of the PBS logo in such instances does not signify PBS

approval of the underlying content, but rather serves to identify the station as a PBS member station.

Apart from co-branding, the PBS logo is also used by PBS in connection with the distribution and marketing of various consumer products related to programming, *e.g.*, books and home videos. Here too, use of the PBS logo does not signify PBS's acceptance of the content on which the logo appears.

D. RECOMMENDATIONS

As a result of its review, the PBS Editorial Standards Review Committee makes the following Recommendations to the PBS Board:

1. Although the principles embodied in PBS's Policies are timeless, the Committee recommends that the PBS Board adopt the attached updated Editorial Standards and Policies, which are designed to further clarify the governing principles of PBS, to keep pace with changes in journalism and technology, and to better reflect the roles and responsibilities of producers, PBS, local public television stations, and the Corporation for Public Broadcasting in the development and distribution of public television content.

Included as Attachment 1 hereto are the Committee's proposed new policies, entitled "Public Broadcasting Service Editorial Standards and Policies" ("Standards and Policies"), which are intended to update the PBS Program Policies adopted in 1987 (included as Attachment 2 hereto). The proposed revisions fully embrace the spirit of the existing Policies, broaden and clarify the understanding of key concepts, including balance and objectivity, and are designed to anticipate further changes in digital technology.

2. The Committee recommends that the Board establish a system for periodic review of PBS's Editorial Standards and Policies to ensure that review takes place more frequently than in the past. The sense of the Committee is that the period between the last formal review and the current review (i.e., 18 years) was too long.

The Committee believes that it is up to PBS management to decide specifically when a review is warranted. However, to get a sense of how often the Committee believes some level of review might be warranted, one suggestion for frequency could be that review should take place every three to five years, or roughly coinciding with the tenure of the PBS President.

The Committee also believes that it is up to PBS management to determine what form each review should take. The Committee by no means is suggesting that a new Committee of outside experts must be formed each time. Various review mechanisms might be appropriate, including review at the staff level if PBS management determines that it would be prudent. However, the Committee believes that it would be helpful if some record of these periodic reviews were maintained and provided the next time a formal outside committee, such as this Committee, is convened.

The Committee was informed by PBS staff that there had been internal staff reviews of the Policies over the years, but the Committee was not briefed on what those reviews involved. For all practical purposes, the last formal review that pertained to the Committee's work, which resulted in a written report to which the Committee could refer, had been done 18 years earlier. That struck the Committee as too long a time.

There was some public speculation as the Committee went about its work that controversies of the moment involving particular programs might be motivating the convening of this review Committee. However, the Committee was informed by PBS staff that, to the contrary, the planning process for the current Committee's review had begun nearly a year prior to the convening of the Committee, before most of these specific incidents occurred. The Committee recognizes that there will always be public

controversies involving content decisions and believes that PBS should never shrink from making the content decisions that best serve its mission while complying with its own editorial standards and policies. Providing content that sparks public debate is an essential element of the PBS mandate.

Nevertheless, periodic review and clear recordkeeping of those reviews will not only ensure that the PBS Editorial Standards and Policies are being adhered to and are present in mind, but will assure that the Standards and Policies remain contemporary in nature and that future formal reviews, such as the one that has led to these Recommendations, are clear in their purpose and motivation.

3. As part of the Committee's determination that transparency and responsiveness to the public should guide the updated PBS Standards and Policies, the Committee recommends that PBS consider creating an ombudsman position.

The Committee believes that a PBS ombudsman would be an effective mechanism for implementing the transparency, responsiveness, and accountability required of a modern media organization. Should PBS agree, the Committee also recommends that the position be structured to ensure that the ombudsman is recognized as independent and thoroughly credible. As such, the Committee recommends that any ombudsman should report to the PBS President; should have the authority to comment freely; should seek to the extent possible to have a presence on-air as well as online; should harbor no hope or expectation of joining PBS at the conclusion of his or her contract; should be someone of significant reputation who is viewed as intellectually independent of PBS; and should have a contract that secures the independence of the position and sufficient time to earn respect and recognition both within and outside of public broadcasting.

PBS management had already been reviewing the possibility of employing an ombudsman when this Committee began its work in early 2005. The Committee was briefed on the background research that PBS staff had conducted and was invited to provide input to PBS management on the matter of management's consideration of hiring an ombudsman.

One of the clear conclusions of the Committee was that if PBS management were to decide to create the position of PBS ombudsman, there would be issues unique to PBS that do not exist at other news organizations. The term "ombudsman" is used for different positions in different places. Some ombudsmen function quite apart from the rest of the staff of a news organization, writing public columns but really having no direct input or involvement in management decisions. Other ombudsmen function as public representatives, with the power to investigate, on behalf of the audience, allegations, complaints, and/or concerns that are brought to them and to seek changes at their news organizations as a result. Still other ombudsmen have actual management authority at their news organizations, helping to create and implement policy. Yet at every media organization we know of, the ombudsman is part of an organization whose own staff produces the content.

This would not be the case at PBS. Whatever the specific responsibilities a PBS ombudsman might have, should the position be created, PBS does not produce its own television content (although it does produce some online content). Moreover, PBS's relationships with producers and local stations are more complex and collaborative than those of a more conventional organization. All of these issues, obviously, should be

carefully considered by PBS management as it contemplates how a PBS ombudsman might work and what his or her responsibilities should be.

4. *The Committee recommends that the Board formally recognize and state its intention to preserve the preeminence of the PBS Editorial Standards and Policies as the constitutional document governing PBS's content development and distribution processes.*

The Committee is proposing updated Standards and Policies as principles that it believes should continue to guide PBS, as the current Policies have guided PBS so well, in its content development and distribution processes. PBS is a valued national institution that has earned the respect of the American public by virtue of its editorial integrity, fidelity to mission, and excellent content. These successes can be traced to PBS's faithful adherence to its own time-tested standards, and to its refusal to submit to standards imposed by any source external to PBS. The Committee recommends that PBS continue to view the Standards and Policies as PBS's "constitutional" guiding principles and to continually strive to adhere to them as such.

This recommendation is simple. The Standards and Policies proposed by this Committee continue the spirit by which PBS has operated for the last two generations. The Committee has endeavored to make them clearer, more contemporary, and to expand certain definitions, such as that of objectivity, to encompass the fullness of what PBS provides.

Moreover, to be credible and free of any hint of political influence, it is essential that PBS – and only PBS – be in the position of monitoring and enforcing PBS's Standards and Policies.

5. *The Committee further recommends that the Board take steps to broadly publicize its editorial standards and policies so that they will be widely understood by the various constituencies of public broadcasting – including the public, producers,*

local stations, the Corporation for Public Broadcasting, and policymakers – and that the Board promote them as “best practices” for use by producers and PBS member stations.

The Committee believes that publicizing the Standards and Policies serves several purposes important to PBS’s editorial well-being. First, it is an obvious and necessary component of the spirit of transparency that the Committee suggests should inform the Standards and Policies throughout. Second, credibility in the contemporary communications culture depends more heavily than ever on the public’s understanding of the procedures and motives of media organizations. Third, promoting a keen understanding by all the relevant constituencies of public broadcasting is the surest way to ensure that PBS’s Editorial Standards and Policies continue to be the preeminent guidelines that govern PBS. Finally, adoption of the Standards and Policies as “best practices” by PBS member stations will promote adherence to PBS’s guiding principles – editorial integrity, quality, diversity and local station autonomy – throughout the public broadcasting system.

ATTACHMENT 1

PUBLIC BROADCASTING SERVICE

**PROPOSED
EDITORIAL STANDARDS AND POLICIES**

SUBMITTED TO BOARD FOR APPROVAL

June 14, 2005

SUBMITTED TO BOARD FOR APPROVAL 6/14/05

PUBLIC BROADCASTING SERVICE EDITORIAL STANDARDS AND POLICIES

I. Introduction

This document is an update of the Public Broadcasting Service (“PBS”) program policies adopted in 1971/72 and updated in 1987. While the principles embodied in those policies are enduring and remain as valid today as when they were first adopted, changes in technology, in public television, in journalism, and experience with the current guidelines necessitate, as the original program policies themselves anticipated, "periodic review of procedures to establish and implement program standards and practices, and a revision of the statement as required."

In reviewing the PBS Program Policies adopted in 1987 (the “Policies”), the Editorial Standards Review Committee convened by PBS found the document was well conceived and remarkably contemporary, and further concluded PBS should continue to operate according to the overall principles it articulates. What was needed, generally, was to make the Policies less exclusively concerned with television programming and more platform neutral. It was essential to recognize the ways in which new delivery systems, such as the Web, have affected and will continue to affect the production, distribution, and consumption of content, and the editorial implications of these changes. In that regard, the Committee believed that a hallmark for PBS in its approach and its content going forward should be transparency.

II. Guiding Principles

The Public Broadcasting Service is a nonprofit membership corporation whose members are licensees of noncommercial educational (or "public") television stations and is governed by a board comprised largely of representatives of its member stations. PBS operates in the public interest by serving the needs of its member stations. Four fundamental principles shape the content service that PBS provides to its member stations: editorial integrity, quality, diversity, and local station autonomy.

A. Editorial Integrity

PBS's reputation for quality reflects the public's trust in the editorial integrity of PBS content and the process by which it is produced and distributed. To maintain that trust, PBS and its member stations are responsible for shielding the creative and editorial processes from political pressure or improper influence from funders or other sources. PBS also must make every effort to ensure that the content it distributes satisfies those editorial standards designed to assure integrity.

B. Quality

In selecting programs and other content for its services, PBS seeks the highest quality available. Selection decisions require professional judgments about many different aspects of content quality, including but not limited to excellence, creativity, artistry, accuracy, balance, fairness, timeliness, innovation, boldness, thoroughness, credibility, and technical virtuosity. Similar judgments must be made about the content's ability to stimulate, enlighten, educate, inform, challenge, entertain, and amuse.

C. Diversity

To enhance each member station's ability to meet its local needs, PBS strives to offer a wide choice of quality content. Content diversity furthers the goals of a democratic society by enhancing public access to the full range of ideas, information, subject matter, and perspectives required to make informed judgments about the issues of our time. It also furthers public television's special mandate to serve many different and discrete audiences. The goal of diversity also requires continuing efforts to assure that PBS content fully reflects the pluralism of our society, including, for example, appropriate representation of women and minorities. The diversity of public television producers and funders helps to assure that content distributed by PBS is not dominated by any single point of view.

D. Local Station Autonomy

PBS believes that public broadcasting's greatest potential is realized when it serves the unique needs of the local community, and that there are wide variations in local needs and tastes. No one is better qualified to determine and respond to those local needs than the public television station licensed to that community.

PBS's role is to assist each station in the exercise of its independent responsibilities by: giving its member stations the broadest possible range of content options, consistent with these Public Broadcasting Service Editorial Standards and Policies; providing stations with timely information necessary to make informed judgments about a program's suitability for local broadcast; and making PBS's content selection process responsive to stations' needs.

III. Roles and Responsibilities

Producers, PBS, local public television stations, and the Corporation for Public Broadcasting ("CPB") play essential and distinct roles in the public broadcasting content development and distribution process. PBS distributes television programming to member stations and other parties (*e.g.*, cable and satellite operators) for distribution to the public via over-the-air broadcast, cablecast, and other means ("Program Content"). In addition, PBS sometimes publishes content directly to the public via digital platforms

such as its Web site, www.pbs.org (“Online Content”). The respective roles and responsibilities of producers, PBS, local public television stations, and CPB may differ in each context. For example, while PBS is responsible for reviewing, acquiring, commissioning, funding, scheduling, promoting, and distributing Program Content, PBS does not itself produce any Program Content. By contrast, PBS occasionally does produce Online Content.

A. Producers

PBS content is produced by a diverse group that includes public television stations and organizations, independent producers (ranging from individual filmmakers to major studios), foreign producers and broadcast organizations, individuals or organizations not normally in the content production business, and, occasionally, in the case of Online Content, PBS itself.

Primary responsibility for content necessarily rests with the producer because it is the producer who creates the content and is uniquely in a position to control all of its elements. Not only would it be impractical for PBS to second-guess the producer's decisions at each step of the production process, but respect for that process demands that producers be allowed the freedom required for creativity to flourish. Thus, in selecting content for distribution, PBS must rely heavily on the producer's honesty, integrity, talent, skill, and good faith.

Producers of content for PBS have an obligation to inform themselves about and adhere to these Standards and Policies and all applicable PBS production and funding guidelines.

B. PBS

PBS is actively involved in encouraging and otherwise fostering the production of quality content. PBS does not itself produce any Program Content. Instead, Program Content and most other content distributed by PBS is produced by people who are not employed by PBS and over whom PBS exercises no direct authority. While producers bear responsibility for content production decisions, PBS bears responsibility and discretion for deciding whether to accept and distribute content, as well as deciding when to schedule it for national distribution. In that role, PBS is the arbiter of whether content meets these Standards and Policies and whether it is appropriate for distribution as part of PBS's national services. PBS performs this function on behalf of member stations and ultimately the audience. Acceptance of Program Content by PBS is signified by the placement of the PBS logo at the conclusion of a program, while acceptance of Online Content by PBS is signified by the availability of the content on www.pbs.org.

Before accepting and distributing content, PBS evaluates it to determine whether it meets these Standards and Policies. To that end, PBS and the producer have a mutual obligation to maintain effective liaison during the production process. The goal

of this liaison is to provide opportunities for early notice and resolution of problems. Thus, PBS has a responsibility to make these Standards and Policies, as well as all applicable PBS production and funding guidelines, known to producers.

The final authority for the decision to distribute content as part of any PBS service rests with PBS. PBS makes its overall decisions about which content to accept and distribute with a view towards assuring, over time, a diversity of subjects, viewpoints, formats, techniques, and content sources.

C. Local Public Television Stations

As a licensee of the Federal Communications Commission, each public television licensee bears a non-delegable duty to assure that its broadcast program services fulfill its statutory obligations as a broadcaster. While other entities, including PBS, may assist the local station in fulfilling those obligations, final responsibility for the quality and integrity of its broadcast services rests with each individual station. Thus, even though PBS has accepted Program Content and made it available to the local station, that station has sole discretion to decide whether and when to broadcast it.

In addition to broadcasting PBS Program Content, public television stations produce their own programs and obtain programs – including some rejected by PBS – from suppliers other than PBS. Thus, denying PBS distribution to a program does not prevent the program from being broadcast on local public television stations. There are many alternative means of distributing programs to public television stations, including the statutorily mandated alternative of distribution over the public television satellite interconnection system. PBS, however, makes no judgment as to the suitability for broadcast of programs distributed by parties other than PBS.

Program Content distributed by PBS carries the PBS logo at the conclusion of each program, identifying the program as one accepted and distributed by PBS as distinct from other program distributors. As the symbol of acceptance by PBS, the PBS logo conveys important information to viewers, and a station may not remove the PBS logo from the end of a program without PBS's consent. By contrast, use of the PBS logo in conjunction with the station's own logo (*e.g.*, use of an on-screen identifier or a print logo that includes both logos) serves only to identify the station as a PBS member station and does not signify PBS approval of the underlying content.

Although PBS strives to provide balanced program services, member stations often choose not to carry the Program Content offered by PBS in its entirety, and each station makes different decisions about how best to supplement PBS's programs. Therefore, each station is ultimately responsible for assuring an appropriate balance of subjects and viewpoints across its broadcast schedule and for complying with all applicable federal statutes and regulations.

While PBS distributes Program Content through its member stations (which retain discretion to broadcast such Program Content or not), PBS distributes Online Content directly to the public, at all times and on a worldwide basis, through its Web site, www.pbs.org. Although pbs.org includes functionality that allows stations to associate their local brands with Online Content, a station cannot choose to limit its association to some but not all of the Online Content available on pbs.org. Pbs.org also provides access to local station information. PBS member stations make their own online content available to the public through their own independently operated Web sites.

D. CPB

The Corporation for Public Broadcasting (“CPB”) is a private, nonprofit corporation created by Congress in 1967 to distribute federally appropriated funds to public broadcasting organizations nationwide. To that end, each year CPB distributes Congressionally appropriated funds to local public broadcasting stations, PBS, and other public television distributors and producers. CPB is a major source of funding for public broadcasting, and provides content funding directly to PBS.

The Public Broadcasting Act (47 U.S.C. § 396 *et seq.*) authorizes CPB to “facilitate the full development of public telecommunications in which programs of high quality, diversity, creativity, excellence, and innovation, which are obtained from diverse sources, will be made available to public telecommunications entities, with strict adherence to objectivity and balance in all programs or series of programs of a controversial nature.” CPB is governed by a Board of Directors whose members are appointees selected by the President of the United States and confirmed for six-year terms by the U.S. Senate. To shield public television producers and distributors from political influence, the Public Broadcasting Act prohibits CPB from owning or operating public television stations and from producing or distributing public television programs. In addition, the Act requires CPB to “carry out its purposes and functions and engage in its activities . . . in ways that will most effectively assure the maximum freedom of [public television] from interference with, or control of, program content or other activities.”

IV. Editorial Standards

Precision in editorial standards is especially difficult because it is impossible to articulate every criterion that might enter into the evaluation of the quality and integrity of particular content. Moreover, a criterion considered mandatory for straight news reporting may not always be appropriate for a documentary or dramatic program.

Content evaluation is an art, not a science, requiring professional judgments about the value of content in relation to a broad range of informational, aesthetic, technical, and other considerations. PBS's task, therefore, is to weigh the merits of the content submitted to it and assure that, viewed in its entirety, the content it

distributes strikes the best balance among these considerations. These Standards and Policies embody the goals of integrity and quality to which PBS aspires, recognizing that judgments about how these standards apply may differ depending on format or subject, and that not all content succeeds equally in satisfying all of these standards.

PBS recognizes that the producer of informational content deals neither in absolute truth nor in absolute objectivity. Information is by nature fragmentary; the honesty of a program, Web site, or other content can never be measured by a precise, scientifically verifiable formula. Therefore, content quality must depend, at bottom, on the producer's professionalism, independence, honesty, integrity, sound judgment, common sense, open mindedness, and intention to inform, not to propagandize.

By placing its logo at the end of a program or hosting a Web site, PBS makes itself accountable for the quality and integrity of the content. Editorial integrity encompasses not only the concerns addressed in these Standards and Policies, but also the concerns about improper funder influence and commercialism addressed in PBS's funding and production guidelines. If PBS concludes that content fails to satisfy PBS's overall standards of quality or any applicable journalistic standard or production practice, PBS may reject the content for distribution.

A. Fairness

Fairness to the audience implies several responsibilities. Producers must neither oversimplify complex situations nor camouflage straightforward facts. PBS may reject a program or other content if PBS believes that it contains any unfair or misleading presentation of facts, including inaccurate statements of material fact, undocumented statements of fact that appear questionable on their face, misleading juxtapositions, misrepresentations, or distortions.

To avoid misleading the public, producers also should adhere to the principles of transparency and honesty by providing appropriate labels, disclaimers, updates, or other information so that the public plainly understands what it is seeing. For example, content that includes commentary, points of view, or opinion should be appropriately identified, as should all sources of funding. Transparency also suggests producers maximize attribution of information and limit the use of anonymous sourcing to those cases when there is no alternative and the information is essential. Content that contains adult themes or other sensitive material should contain an appropriate disclosure.

Producers should treat the people who are the subjects of, who appear in, or who are referenced in the content they produce with fairness and respect. PBS will reject content if, in PBS's judgment, it unfairly treats the people or misrepresents their views. Fair treatment of individuals generally requires that a producer represent the words and actions of the people portrayed or identified in a way that presents their strongest case, and gives individuals or organizations that are the subject of attack or criticism an opportunity to respond. Fairness also requires that a producer be willing to consider all relevant information and points of view.

B. Accuracy

The honesty and integrity of informational content depends heavily upon its factual accuracy. Every effort must be made to assure that content is presented accurately and in context. Programs, Web sites, and other content containing editorials, analysis, commentary, and points of view must be held to the same standards of factual accuracy as news reports. A commitment to accuracy includes a willingness to correct the record if persuasive new information that warrants a correction comes to light, and to respond to feedback and questions from audiences.

PBS may undertake independent verification of the accuracy of content submitted to it. Producers of informational content must exercise extreme care in verifying information, especially as it may relate to accusations of wrongdoing, and be prepared to correct material errors. PBS will reject content that, in its judgment, fails to meet PBS's standard of accuracy.

C. Objectivity

Along with fairness and accuracy, objectivity is the third basic standard to which journalists are held. While PBS holds all news and informational content to standards of objectivity, PBS recognizes that other types of content may not have the objective presentation of facts as their goal.

Objectivity, however, encompasses more than news and information presented in a neutral way. It also refers to the process by which a work was produced, including work that involves analysis or, as a result of reporting, arrives at conclusions. To begin with, journalists must enter into any inquiry with an open mind, not with the intent to present a predetermined point of view. Beyond that, for a work to be considered objective, it should reach a certain level of transparency. In a broad sense, this spirit of transparency means the audience should be able to understand the basics of how the producers put the material together. For example, the audience generally should be able to know not only who the sources of information are, but also why they were chosen and what their potential biases might be. As another example, if producers face particularly difficult editorial decisions that they know will be controversial, they should consider explaining why choices were made so the public can understand. Producers should similarly consider explaining to the audience why certain questions could not be answered, including why, if confidential sources are relied on, the producers agreed to allow the source to remain anonymous. And the spirit of transparency suggests that if the producers have arrived at certain conclusions or a point of view, the audience should be able to see the evidence so it can understand how that point of view was arrived at. One aspiration implicit in the idea of transparency is that an audience might appreciate and learn from content with which it also might disagree.

Opinion and commentary are different from news and analysis. When a program, segment, or other content is devoted to opinion or commentary, the principle of transparency requires that it be clearly labeled as such. Any content segment that

presents only like-minded views without offering contrasting viewpoints should be considered opinion and should identify who is responsible for the views being presented.

No content distributed by PBS should permit conscious manipulation of selected facts in order to propagandize.

D. Balance

PBS seeks to present, over time, content that addresses a broad range of subjects from a variety of viewpoints. PBS may, however, choose to consider not only the extent to which the content contributes to balance overall, but also the extent to which specific content is fairly presented in light of available evidence.

Where appropriate, PBS may condition acceptance of content on the producer's willingness to further the goal of balance by deleting designated footage or by including other points of view on the issues presented or material from which the public might draw a conclusion different from that suggested by the content. Material to be added may range from a few words, to a complete content segment, to an added episode in a series of programs, to the production of an entirely separate, new program. Where PBS deems it appropriate, PBS may arrange for the production of additional content by a producer other than the producer of the original content material. For Online Content, links to credible, high-quality, related resources may be used to provide access to additional information or viewpoints.

E. Responsiveness to the Public

Producers must work with PBS to respond to and interact with the public. This may include providing an outlet for public feedback about content and helping to create material for the Web that allows audiences to learn more, seek background information, access documents alluded to in a program, answer questions that a program might not have been able to address, and even customize information. Accountability is a goal, including answering audience questions and responding to criticisms about programs or content. When public feedback is published by PBS it should be labeled as such, and standards for publication – such as those relating to obscenity or personal attacks – should be clearly communicated.

F. Courage and Controversy

PBS seeks content that provides courageous and responsible treatment of issues, and that reports and comments, with honesty and candor, on social, political, and economic tensions, disagreements, and divisions. The surest road to intellectual stagnation and social isolation is to stifle the expression of uncommon ideas; today's dissent may be tomorrow's orthodoxy. The ultimate task of weighing and judging information and viewpoints is, in a free and open society, the task of the audience. Therefore, PBS seeks to assure that its overall content offerings contain a broad range of opinions and points of view, including those from outside society's existing consensus,

presented in a responsible manner and consistent with the standards set forth in these Standards and Policies.

G. Substance Over Technique

Advances in production technology carry with them the possibility that technique may overwhelm substance, distorting the information, making it technically inaccessible or distracting the public's attention from its central thrust. Neither people nor ideas ought to be victimized by technical trickery. PBS will reject content that, in its judgment, disserves the viewer or its subject matter by inappropriately pursuing technique at the expense of substance.

H. Experimentation and Innovation

PBS seeks content that is innovative in format, technique, or substance. The absence of commercial considerations accords PBS the freedom to experiment in ways not always tolerable in the commercial environment. The potential for innovation can be fully realized only if PBS is bold enough to take occasional risks.

I. Exploration of Significant Subjects

Unlike their commercial counterparts, public television stations do not sell time for profit and are, therefore, free from the constraints that compel commercial broadcasters to pursue the largest audience. PBS seeks programs that will enable its member stations to explore significant subjects even if those subjects or their treatment may not be expected to appeal to a large audience.

J. Unprofessional Conduct

PBS expects producers to adhere to the highest professional standards. PBS may reject content if PBS has reason to believe that a producer has violated basic standards of professional conduct. Examples of unprofessional conduct by a producer include such things as plagiarism, fabrication, obtaining information by bribery or coercion, insensitivity to tragedy or grief, and real or perceived conflicts of interest such as accepting gifts, favors, or compensation from those who might seek to influence the producer's work.

K. Unacceptable Production Practices

It is impossible to anticipate every situation with which a producer of informational content must contend. Nevertheless, certain areas present such frequently encountered dangers that they merit explicit warning. In general, they would fall under two broad concepts:

- Never invent or add elements that were not originally there; and
- Never make choices that mislead or deceive the audience.

1. Staging. Producers of news content should not stage events or suggest that others stage events for the sake of media coverage.

2. Re-creations and Simulations. In instances where re-creations or simulations of actual events are necessary and desirable, they should be clearly identified if there is any possibility that the viewer would be confused or misled.

3. Distorted Editing. All producers face the necessity of selection – which material is to be left in, which is to be edited out. Reducing and organizing this information is part of the producer's craft. It is the objective of the editing process to collect and order information in a manner that fairly portrays reality. Producers must assure that edited material remains faithful in tone and substance to that reality. When editing, producers of informational content must not sensationalize events or create a misleading or unfair version of what actually occurred. When significant interruptions of time or changes of setting occur, they should be unambiguously identified for the viewer.

4. Deception. The credibility of content is jeopardized whenever the audience or a source is duped or feels duped. Deceiving the audience would include such examples as when time is conflated so that it appears that several interviews were actually one. Duping a source would include when a producer misleads an interviewee concerning the purpose of the interview. Honesty, candor, and common courtesy must govern producers' behavior.

5. Pre-trial Publicity. Our legal system presumes that criminal defendants are innocent until proven guilty. In reporting on crimes and related legal proceedings, producers must be sensitive to the rights of the accused to a fair trial and the effect of pre-trial publicity. Producers should be wary of self-serving statements from both prosecuting and defense attorneys. They should also remain cautious about using alleged evidence in any content to be made available to the public pre-trial.

6. Media Manipulation. Manipulation can be effected either by the media or by others seeking to use the media for their own purposes. Television is an extraordinarily powerful instrument; the mere presence of television cameras can change or influence events. Producers must minimize and, to the extent possible, eliminate this interference. In crowds, demonstrations, and riots, during terrorist incidents, and in other similar circumstances, camera crews and production teams should seek to be as inconspicuous as possible, and, as appropriate, cap lenses or withdraw completely when their presence might incite an extreme reaction or unduly influence the course of events.

7. Manipulation of the Audience. The use of music and sound effects, dramatic lighting or staging, or other artificial effects can subtly affect the impression left with the audience. Producers must exercise care not to use such techniques in a way that is unfairly manipulative by distorting the reality of what occurred.

PBS may reject and decline to distribute any content that, in its judgment, violates the production practices identified above or shows evidence of any other production practice that is not consistent with accepted professional standards.

L. Objectionable Material

Responsible treatment of important issues may sometimes require the inclusion of controversial or sensitive material, but good taste must prevail in PBS content. Morbid or sensational details, or material that is gratuitously offensive to general taste or manners (*e.g.*, extreme violence, racial epithets, strong language, nudity, sexism), should not be included unless it is necessary to an understanding of the matter at hand.

Questions of taste cannot be answered in the abstract, but when specific problems arise, they must be resolved in light of contemporary standards of taste, the state of the law, and the newsworthiness and overall value of the material. If PBS concludes that the exclusion of such material would distort an important reality or impair the content's artistic quality, PBS may accept the content provided it carries appropriate notice to the viewer. Conversely, PBS may reject content that, in its judgment, needlessly contains objectionable material that compromises the content's quality or integrity.

Adopted: _____, 2005

ATTACHMENT 2

PUBLIC BROADCASTING SERVICE PROGRAM POLICIES

April 15, 1987

PUBLIC BROADCASTING SERVICE

PROGRAM POLICIES

I. Introduction

The Statement of Policy on Program Standards ("Program Standards"), adopted in 1971, and the Document of Journalism Standards and Guidelines ("Journalism Guidelines"), adopted in 1972, contain the fundamental principles that have guided the program decisions of the Public Broadcasting Service ("PBS"). While the principles embodied in those policies remain as valid today as when they were first adopted, public television has matured and changed. As the original Program Standards themselves recognize, such changes warrant "periodic review of procedures to establish and implement program standards and practices, and a revision of the statement as required."

This document is the result of such a review and is intended to replace both the Program Standards and Journalism Guidelines. It clarifies and codifies, for the benefit of PBS, its member stations, and producers, the policies that guide PBS's evaluation of programs. PBS's decision to accept or reject a program is symbolized by the conferring or withholding of the PBS logo. The appearance of the PBS animated logo at the close of a program is the imprimatur of PBS's decision to accept a program for national distribution.

This document also articulates some of the unwritten policies that have evolved since 1972 and clarifies the respective responsibilities of local broadcast stations, producers, and PBS in light of the past fifteen years' experience.

II. Guiding Principles

The Public Broadcasting Service is a nonprofit membership corporation whose members are licensees of noncommercial educational (or "public") television stations.⁷ PBS is owned and governed by its member stations, and its purpose is to serve their needs. Four fundamental principles shape the program service that PBS provides to its member stations: editorial integrity, program quality, program diversity, and local station autonomy.

⁷ The terms "stations," "member stations," and "licensees" are often used interchangeably, but have different technical meanings. "Licensees" refers to noncommercial entities authorized by the Federal Communications Commission to operate full-power VHF and UHF television transmitters. In some cases, a licensee is the "parent" of two or more stations in different communities. If these stations meet certain criteria for programming and fiscal independence, they may qualify as independent PBS "member stations." Unless otherwise specified, "stations" refers to the PBS member stations.

A. Editorial Integrity

PBS's reputation for quality reflects the public's trust in the editorial integrity of PBS programs and the process by which they are selected. To maintain that trust, PBS and its member stations are responsible for shielding the programming process from political pressure or improper influence from program funders or other sources. PBS must also make every effort to ensure that the programs it distributes satisfy those editorial standards that are designed to assure program integrity.

B. Program Quality

In selecting programs for its service, PBS seeks to obtain the highest quality programs available. Selection decisions require professional judgments about many different aspects of program quality, including but not limited to excellence, creativity, artistry, accuracy, balance, fairness, timeliness, innovation, boldness, thoroughness, credibility, and technical virtuosity. Similar judgments must be made about the program's ability to stimulate, enlighten, educate, inform, challenge, entertain, and amuse.

C. Diversity

To enhance each member station's ability to provide a program service that meets its local needs, PBS strives to offer a wide choice of quality programs. Program diversity furthers the goals of a democratic society by enhancing public access to the full range of ideas, information, and viewpoints required to make informed judgments about the issues of our time. It also furthers public television's special mandate to serve many different and discrete audiences.

The diversity of public television producers and funders helps to assure a wide variety of program subjects and approaches, providing a bulwark against program domination by any single point of view. The goal of diversity also requires continuing efforts to assure that PBS programs fully reflect the pluralism of our society, including, for example, appropriate representation of women and minorities.

D. Local Station Autonomy

Public television's programming philosophy rests on the belief that the greatest potential of television is realized when it serves the unique needs of the local community, and on the recognition that there are wide variations in local program needs and tastes. No one is better qualified to determine and respond to those local needs than the public television station licensed to that community.

PBS's role is to assist each station in the exercise of its independent programming responsibility by: giving its member stations the broadest possible range of program options, consistent with these Program Policies; providing stations with timely information necessary to make informed judgments about a program's suitability

for local broadcast; and making PBS's program selection process responsive to stations' needs.

III. Roles and Responsibilities

Producers, PBS, and local public television stations each play essential and distinct roles in the public television programming process. PBS is charged by its member stations with responsibility for reviewing, selecting, scheduling, promoting, distributing, and, on occasion, developing and funding programs. Although PBS is expected to encourage and otherwise foster the production of quality programs, PBS does not itself produce any programs. As a result, programs distributed by PBS are produced by people who are not employed by PBS and over whom PBS exercises no direct authority.

A. Producers

Programs distributed by PBS are produced by a diverse group that includes public television stations, independent institutions such as the Children's Television Workshop, independent producers (ranging from individual filmmakers to major studios), foreign producers and broadcast organizations, and individuals or organizations not normally in the program production business.

Primary responsibility for the content of a program necessarily rests with the producer because it is the producer who creates the program and is uniquely in a position to control all of its elements. Not only would it be impractical for PBS to second-guess the producer's decisions at each step of the production process, but respect for that process demands that producers be allowed the freedom required for creativity to flourish. Thus, in selecting a program for distribution, PBS, and in turn those stations that broadcast the program, must rely heavily on the producer's honesty, integrity, talent, skill, and good faith.

To assure that completed programs meet the standards embodied in these Program Policies, PBS and the producer have a mutual obligation to maintain effective liaison during the production process. The goal of this liaison is to provide opportunities for early notice and resolution of problems. Thus, PBS has a responsibility to make its Program Policies known to producers, and producers have an obligation to inform themselves about and adhere to PBS's policies.

B. PBS

While the producer bears responsibility for program production decisions, PBS bears responsibility and discretion for deciding whether to accept and distribute the program with the imprimatur of the PBS logo, as well as deciding when to schedule the program for national distribution. Before accepting a program, PBS evaluates it to determine whether it meets the standards in these Program Policies. PBS constructs its

overall program schedule with a view towards assuring, over time, a diversity of subjects, viewpoints, formats, techniques, and program sources.

C. Local Public Television Stations

Each public television licensee bears a non-delegable duty to assure that its program service fulfills its statutory obligations as a broadcaster. While other entities, including PBS, may assist the local station to fulfill those obligations, final responsibility for the quality and integrity of its broadcast service rests with each individual station. Thus, even though PBS has accepted a program and made it available to the local station, that station has sole discretion to decide whether and when to broadcast it.

In addition to broadcasting PBS programs, public television stations produce their own programs and obtain programs -- including some rejected by PBS -- from suppliers other than PBS. Thus, denying the PBS logo to a program does not bar it from broadcast on local public television stations. There are many alternative means of distributing programs to public television stations, including the statutorily-mandated alternative of distribution over the public television satellite interconnection system. PBS, however, makes no judgment as to the suitability for broadcast of any program that does not bear the PBS logo.

The PBS logo identifies programs accepted by PBS, as distinct from other program distributors. As the symbol of acceptance by PBS, the PBS logo conveys important information to viewers, and a station may not remove the PBS logo from a program without PBS's consent.

Although PBS strives to provide a balanced program service, member stations often choose not to carry that service in its entirety, and each makes different decisions about how best to supplement PBS's programs. Therefore, each station is ultimately responsible for assuring an appropriate balance of subject and viewpoint across its broadcast schedule and for complying with all applicable federal statutes and regulations.

IV. Editorial Standards

Precision in editorial standards is especially difficult because it is impossible to articulate every criterion that might enter into the evaluation of a program's quality and integrity. Moreover, a criterion considered mandatory for straight news reporting may not always be appropriate for a documentary or dramatic program.

Program evaluation is an art, not a science, requiring professional judgments about a program's value in relation to a broad range of informational, aesthetic, technical, and other considerations. PBS's task, therefore, is to weigh the merits of the programs submitted to it and assure that the overall program schedule strikes the best balance among these considerations. These Editorial Standards embody

the goals of integrity and quality to which PBS aspires in its program service, recognizing that not all of these standards apply equally to all program formats or subjects, and that not all programs succeed equally in satisfying all of these standards.

PBS recognizes that the producer of an informational program deals neither in absolute truth nor in absolute objectivity. Information is by nature fragmentary; the honesty of a program can never be measured by a precise, scientifically verifiable formula. Therefore, the quality of a program must depend, at bottom, on the producer's professionalism, independence, honesty, integrity, sound judgment, and common sense.

By placing its logo on a program, PBS makes itself accountable for the quality and integrity of the program. Editorial integrity encompasses not only the concerns addressed in these Editorial Standards, but also the concerns about improper funder influence and commercialism addressed in the National Program Funding Standards and Practices. If PBS concludes that a program fails to satisfy PBS's overall standards of quality or any applicable journalistic standard or production practice, PBS may reject and withhold its logo from the program.

A. Fairness

In fairness to the viewer, producers must neither oversimplify complex situations nor camouflage straightforward facts. PBS may reject and withhold its logo from a program if PBS knows that it contains any unfair or misleading presentation of facts, including inaccurate statements of material fact, undocumented statements of fact that appear questionable on their face, misleading juxtapositions, misrepresentations, or distortions.

To avoid misleading viewers, producers should provide appropriate labels, disclaimers, updates, or other information so that viewers understand what they are seeing. For example, programs that contain commentary, points of view, or opinion should be appropriately identified. Programs that contain adult themes or other sensitive material should contain an appropriate disclosure so that viewers may make an informed decision whether to watch.

Producers should treat the people who are the subjects of, or who appear in, their programs fairly and with respect. PBS will withhold its logo from a program if, in PBS's judgment, it unfairly treats the people or the views they represent. Fair treatment of program participants generally requires that a producer represent fairly the words and actions of the people portrayed in a program and give individuals or organizations that are the subject of attack an opportunity to respond. Fairness also requires that a producer be willing to consider contrary information.

B. Accuracy

The honesty and integrity of an informational program depends heavily upon its factual accuracy. Every effort must be made to assure that program content is presented accurately and in context. Editorials, analysis, commentary, and point-of-view programs must be held to the same standards of factual accuracy as news reports.

Where necessary, PBS may undertake independent verification of the accuracy of programs submitted to it. Producers of informational programs must exercise extreme care in verifying information, especially as it may relate to accusations of wrongdoing, and be prepared to correct material errors. PBS will reject and withhold the PBS logo from a program that, in its judgment, fails to meet PBS's standard of accuracy.

C. Objectivity

Along with fairness and accuracy, objectivity is the third basic standard to which journalists are held in reporting news. News reporting permits no room for personal bias or distortion by conscious manipulation of selected facts or other program elements. While PBS holds all news programs to this standard of objectivity, PBS recognizes that other program formats may not have the objective presentation of facts as their goal.

Programs containing analysis, opinion, and points of view play an important role in informing the public about issues. Therefore, while PBS pursues objectivity in its news coverage, that pursuit should not stifle the expression of points of view either in segments of news reports or in other PBS programs.

D. Balance

PBS seeks to present, over time, programs that address a broad range of subjects from a variety of viewpoints. In evaluating programs, PBS may, however, consider not only the extent to which the program contributes to balance over the full PBS schedule, but also the extent to which the program's internal treatment of subject matter is fairly balanced.

Where appropriate, PBS may condition acceptance of a program on the producer's willingness to further the goal of balance by deleting designated footage or by including other points of view on the issues presented or material from which a viewer might draw a conclusion different from that favored in the program. The program material to be added may range from a few words, to a complete program segment, to an added episode in a series, to the production of an entirely separate, new program. Where PBS deems it appropriate, PBS may arrange for the production of additional programs or program material by a producer other than the producer of the original program.

E. Courage and Controversy

PBS seeks programs that provide courageous and responsible treatment of issues and that report and comment, with honesty and candor, on social, political, and economic tensions, disagreements, and divisions. The surest road to intellectual stagnation and social isolation is to stifle the expression of uncommon ideas; today's dissent may be tomorrow's orthodoxy. The ultimate task of weighing and judging a program's information and viewpoint is, in a free and open society, the task of the viewer. Therefore, PBS seeks to assure that its overall program schedule contains a broad range of opinions and points of view, including those from outside society's existing consensus, presented in a responsible manner and consistent with the standards set forth in these Program Policies.

F. Substance Over Technique

Advances in production technology carry with them the possibility that technique may overwhelm substance, distorting the information content of a program or distracting the viewer's attention from its central thrust. Neither people nor ideas ought to be victimized by technical trickery. PBS will reject and withhold its logo from a program that, in its judgment, disserves the viewer or its subject matter by inappropriately pursuing technique at the expense of substance.

G. Experimentation and Innovation

PBS seeks programs that are innovative in format, technique, or content. The absence of commercial considerations accords PBS the freedom to experiment in ways not always tolerable in the commercial environment. The potential for innovation can be fully realized only if PBS is bold enough to take occasional risks. For PBS, this freedom is tempered by the knowledge that innovation is not a virtue if the result is a program so eccentric that its member stations will not broadcast it or viewers will not watch.

H. Exploration of Significant Subjects

Unlike their commercial counterparts, public television stations do not sell time for profit and are, therefore, free from the constraints that compel commercial broadcasters to pursue the largest audience. PBS seeks programs that will enable its member stations to explore significant subjects even if those subjects or their treatment may not be expected to appeal to a large audience.

I. Unprofessional Conduct

PBS expects producers to adhere to the highest professional standards. PBS may reject and withhold the PBS logo from a program if PBS has reason to believe that a producer has violated basic standards of professional conduct.

J. Unacceptable Production Practices

It is impossible to anticipate every situation with which a producer of an informational program must contend. Nevertheless, certain areas present such frequently encountered dangers that they merit explicit warning:

1. Staging. Producers of news programs should not stage events or suggest that others stage events for the sake of broadcast coverage.

2. Re-creations and Simulations. In instances where re-creations or simulations of actual events are necessary and desirable, they should be clearly identified if there is any possibility that the viewer would be confused or misled.

3. Distorted Editing. All producers face the necessity of selection -- which material is to be left in, which is to be edited out. Reducing and organizing this information is part of the producer's craft.

It is the objective of the editing process to collect and order information in a manner that fairly portrays reality. Producers must assure that edited material remains faithful in tone and substance to that reality. In editing programs, producers of informational programs must not sensationalize events or create a misleading or unfair version of what actually occurred. When significant interruptions of time or changes of setting occur, they should be unambiguously identified for the viewer.

4. Deception. The credibility of a program is jeopardized whenever the viewer or a program participant is duped or feels duped as, for example, when a producer misleads an interviewee concerning the purpose of the interview. Honesty, candor, and common courtesy must govern producers' behavior.

5. Pre-trial Publicity. Our legal system presumes that criminal defendants are innocent until proven guilty. In reporting on crimes and related legal proceedings, producers must be sensitive to the rights of the accused to a fair trial and the effect of pre-trial publicity. Producers should be wary of self-serving statements from both prosecuting and defense attorneys. They should also remain cautious about using alleged evidence in any program scheduled for pre-trial broadcast.

6. Media Manipulation. Manipulation can be effected either by the media or by others seeking to use the media for their own purposes. Television is an extraordinarily powerful instrument; the mere presence of television cameras can change or influence events. Producers must minimize, and, to the extent possible, eliminate this interference. In crowds, demonstrations, and riots, during terrorist incidents, and in other

similar circumstances, camera crews and production teams should seek to be as inconspicuous as possible, and, as appropriate, cap lenses or withdraw completely when their presence might incite an extreme reaction or unduly influence the course of events.

7. Manipulation of the Viewer. The use of music and sound effects, dramatic lighting or staging, or other artificial effects can subtly affect the impression left with the viewer. Producers must exercise care not to use such techniques in a way that is unfairly manipulative.

PBS may reject and withhold its logo from any program that, in its judgment, violates the production practices identified above or shows evidence of any other production practice that is not consistent with accepted professional standards.

K. Objectionable Material

Responsible treatment of important issues may sometimes require the inclusion of controversial or sensitive material, but good taste must prevail in PBS programs. Morbid or sensational details, or material that is gratuitously offensive to general taste or manners (e.g., extreme violence, racial epithets, strong language, nudity, sexism), should not be included unless it is necessary to an understanding of the matter at hand.

Questions of taste cannot be answered in the abstract, but when specific problems arise, they must be resolved in light of contemporary standards of taste, the state of the law, and the newsworthiness and overall value of the material. If PBS concludes that the exclusion of such material would distort an important reality or impair the program's artistic quality, PBS may accept the program provided it carries appropriate notice to the viewer. Conversely, PBS may reject and withhold the PBS logo from a program that, in its judgment, needlessly contains objectionable material that compromises the program's quality or integrity.



In conclusion, the Editorial Standards set forth above embody some of the basic principles that inform PBS's judgments about program quality and integrity. For any given program, however, considerations other than those identified above may be relevant. Judgments about program quality, integrity, and diversity also turn upon a host of non-editorial considerations. Ultimately, the decision to accept or reject a program must reflect a professional judgment whether the program satisfies PBS's overall standards of quality, integrity, and diversity. PBS may reject and withhold its logo from any program that fails to do so.

Adopted: April 15, 1987

ATTACHMENT 3

**MATERIALS PROVIDED TO
PBS EDITORIAL STANDARDS COMMITTEE
FOR REVIEW**

**MATERIALS PROVIDED TO
PBS EDITORIAL STANDARDS COMMITTEE FOR REVIEW**

1. Public Broadcasting Service Program Policies, April 15, 1987
2. Report of the Special Committee on Program Policies and Procedures to the PBS Board of Directors, April 15, 1987
3. “ABOUT PBS: Corporate Facts” ; “ABOUT PBS: Programming” (from www.pbs.org)
4. PBS Guidelines (selected sections):
 - PBS production guidelines (“Red Book”)
 - PBS underwriting guidelines (“Funding Standards and Practices”)
 - PBS online production guidelines (“Web Production Manual”)
5. Tom Rosenstiel memorandum analyzing current PBS Program Policies and identifying potential issues for consideration by the Committee
6. Journalism Standards/Codes of Ethics of:
 - Society of Professional Journalists
 - Radio and Television News Directors Association
 - Public Radio News Directors Inc.
 - National Public Radio
 - British Broadcasting Corporation
 - Canadian Broadcasting Corporation
 - Canadian Broadcast Standards Council
 - New York Times
 - Poynter Institute of Media Studies
 - Jim Lehrer
7. Programming Policies/Editorial Standards of:
 - WGBH, Boston, MA
 - Minnesota Channel / Collaborative
 - Wisconsin Public Broadcasting
 - New Hampshire Public Television
 - South Dakota Public Broadcasting
 - Lehigh Valley Public Telecommunications Corporation
 - “Frontline”
 - “Vermont This Week”
8. PBS staff memo, “Comparison of Treatment of Standards in Codes of Ethics/Journalism Standards”

9. Presentations on:

- Overview of PBS and its unique role as non-producing program provider
- pbs.org and its unique production process
- PBS's underwriting and co-production guidelines
- PBS's responses to the recommendations of the 1987 Special Committee
- PBS staff's identification of major issues in updating the current Policies
- PBS management's consideration of appointment of a PBS ombudsman
- Overview of Corporation for Public Broadcasting's role and responsibilities

10. Recent Public Opinion Polls on PBS:

- Roper Public Opinion Poll on PBS: 2005 vs. 2004
- 2005 PBS Opinion Study, POSTED QUESTIONNAIRE, Job # C 205-403062, February 11, 2005

11. "Extreme Oil" on DVD

12. "Trade Secrets: A Moyers Report" on DVD