

# KPFT OPERATIONS GUIDE

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*Credits: prepared by Ernesto Aguilar from a variety of sources, as well as original content.*

*Last Update: November 2007*

*Proofing and other assistance from Judi Beckett, Luke Jones, George Murphy, Eric Truong, Jayn Walter.*

# INTRODUCTION

The Operations and Training Guides came together for two main reasons:

- o To explain to programmers the basic standards they are expected to understand.
- o To support more awareness of the legal and ethical issues affecting us. Though it may seem like a pain to worry about the rules, violating the rules could cost us a lot of money or our license.

Knowledge (sometimes right, sometimes wrong) gets passed along from volunteer to volunteer, but KPFT has very little on paper in terms of guidance for programmers. This Operations and Training Guides are an attempt to clarify what programmers are responsible for, and to train everyone on helpful skills. If you are a new volunteer, the Operations and Training Guides should be reviewed together. Those who have been programming should refer to the Operations Guide.

The policies enacted by this book supersede and replace any earlier policies and any individual agreements between individual programmers and past or present staff members.

This is a work in progress. Your ideas and input will help make it better.

Ernesto Aguilar  
Program Director, 2005-

# BASIC PROGRAMMER STANDARDS

## Expectations of volunteers

- o Sign in and log hours in the KPFT volunteer log.
- o Sign off on and abide by Pacifica volunteer documentation, codes and agreements.
- o Keep current contact information (legal name, address, phone, etc.) and photocopy of identification on file with KPFT.
- o Do not bring water, food or beverages near equipment or into the control room or production room.
- o Clean up your messes at the station and turn out lights not being used.
- o Attend training classes when required.
- o Correctly and promptly refile anything used from the music library.
- o Do not smoke inside the building.
- o Control access to the station after business hours during your air shift, as specified in the Station Access Policy.
- o Answer the control room and emergency (red) phones, direct calls and/or take messages and pledges, if necessary.
- o Do not use broadcast time for the sale of any broadcast material and or services for the purpose of economic profit for individuals, companies, corporations, including small business and other privately owned and operated establishments or groups not otherwise designated as registered non-profit organizations.
- o Use KPFT facilities accordingly for the purpose of conducting KPFT business and broadcast operations.
- o Do not lobby for issues regarding their employment or their own programming.
- o Do not engage in attacks or vendettas against any persons or groups based on ethnic origin, cultural heritage, and religious affiliation or gender preference.
- o Assist with at least one event per year. Volunteers wishing to produce events on behalf of the station must work with the appropriate staff or LSB committee(s).
- o Work with the Development Director if applying for grants.
- o Do not violate laws applicable to non-profit organizations.
- o Compensate KPFT for equipment damaged due to carelessness or neglect.

- o Do not engage in any other conduct harmful to KPFT.

## PROGRAMMING

- o All programmers shall adhere to the Pacifica Foundation Mission.
- o Arrive at least 30 minutes prior to your air shift and/or volunteer shift.
- o Stay within allotted times for your air shift.
- o Conclude your last call, guest, et al. five minutes to the end of the program (e.g. three minutes before promos/PSAs are scheduled to air) and wrap up the program in your remaining time.
- o Play all promos and public service announcements as assigned and without comment.
- o Stay after your shift until the next programmer or staff comes to relieve you.
- o Give a legal station identification at least once an hour, within five minutes at the beginning or end of the hour. Use proper identification: KPFT Houston.
- o Read an Emergency Alert System (EAS) printout when it comes off the machine, and then place it in the Chief Engineer's mailbox.
- o Keep playlists of all recordings aired during a music program. Playlists must be filed out on the station website.
- o Complete an information sheet for each program containing all pertinent details of guests, topics and announcements. These forms assist staff and other volunteers in answering the questions referenced above.
- o Anyone who seeks to be on air as a programmer must have prior approval by the office of the Program Director.
- o All programmers will provide one-week notification of request for host substitution. That includes any broadcast from a remote location and/or guest co-host. In the event of an emergency notification should be made to management immediately.
- o When you substitute for another programmer, stick to the format and feeling of that program. Let the listeners know you are substituting, for whom, and the name of the program.
- o During every broadcast, identify and re-identify the program, topic of discussion and the guest with any and all appropriate titles and organization affiliations.
- o Do not condone nor support public and or private fundraising on the airwaves unless otherwise sanctioned and / or approved in writing by KPFT management.

- o Do not air material that may violate FCC guidelines.
- o Do not support or oppose on the air any candidate for political office.
- o Do not attack or make negative comments about the station on the air (as opposed to a principled dissent from a policy or action by the station as an organization as part of a legitimate discussion of that issue).
- o During on-air time, do not advocate breaking the law.
- o Do not knowingly broadcast hoaxes (false information concerning a crime or catastrophe).
- o Do not be rude on the air to an individual or group.
- o Do not miss more than 20 percent of your air shifts per year.
- o Do not change your format without approval of the Program Director.
- o Do not give a "play by play" of studio happenings. Avoid dead air.
- o Pitch and cooperate with pledge producer and shift supervisors during your on-air shift during membership drives.
- o Seek approval by the office of the events/outreach coordinator for all on-air promotions for events and venues.
- o LSB members may not demand airtime on any program. Their presence is entirely up to individual programmers.
- o All pre-produced programs will have a Total Running Time (TRT) of 57:30 (1 hour programs) and 28:30 (1/2 hour programs)

## TECHNICAL

- o There is no variation in sound levels.
- o Avoid different levels from mics, CDs and other program components requiring the listeners to continually adjust their volume controls.
- o The sound quality of the various components (recorded music, taped interviews) is good enough that listener enjoyment is not inhibited.
- o There is a minimum of hiss, good EQ (treble/bass adjustment to voices), no sibilance and no plosives.

## VOCAL TECHNIQUE AND MANNER

- o The programmer makes smooth transitions between talk and music without verbal fumbling.
- o The programmer doesn't apologize for on-air errors.
- o Names are pronounced correctly.
- o Spoken content is delivered in a clear voice at an easy measured pace.

## INFORMATION/CONTENT

- o The content is woven seamlessly into the show.
- o Talk is well planned and dynamic.
- o The station's programming balance is contributed to by following the show's approved program proposal.
- o The host and guests are engaging and knowledgeable.
- o The content "tells a story" by making a coherent point and exploring a definite theme. It should be evident what story is being told and why.
- o Points of view differing from those presented on a specific program are either: acknowledged, provided with a forum the host explains or also presented.
- o New ideas and new art are sought. Programmers chart new territory.
- o A commitment is made to local talent development and individuals/groups/genres underrepresented in mainstream media.
- o Flow between different segments and different guests demonstrate their relevance and relationship.
- o Reference is made to relevant/related programming/services/events when appropriate.

# RULES OF THE ROAD

## AIR SHIFT TRANSITIONS

You are expected to cooperate with the upcoming programmer and should allow him/her to quietly gather recordings and other things necessary for their show. You should have your materials cleared from the studio at least five minutes before the end of your air shift.

## THEFT/FACILITY/FUNDS

The appropriate paid staff must approve personal use of station property in advance. Unauthorized removal of station property from the premises, or its conversion to personal use, shall be considered cause for suspension or dismissal. All volunteers are expected to exercise due care in the use of station property (building, supplies and equipment) and to use such property only for authorized purposes. The station assumes no responsibility for loss of or damage to personal property.

Volunteers must acquire a written agreement signed in advance by an authorized station representative before selling material produced at the station. All program material produced by volunteers using station equipment or materials remains the exclusive property of the station unless special arrangement is made in writing for special exemption, or a contract is negotiated in which the station assigns its rights. Any remuneration received for programs produced by volunteers with station equipment shall be split between the station and the volunteer, with the station receiving a minimum of 50 percent of the remuneration.

Volunteers who accept funds or goods on behalf of the station shall turn them over to the appropriate paid staff on the first working day following acceptance.

## ALCOHOL/DRUGS

The Pacifica Foundation is committed to promoting a safe and healthy work environment for all employees. Consequently, all employees are prohibited from engaging in the manufacture, distribution, dispensing, possession, or use of a controlled substance or alcohol on the premises.

Violations of this policy may result in appropriate disciplinary action including termination of on-air program and volunteer privileges.

## PROHIBITING WORKPLACE VIOLENCE

Violence or the threat of violence by or against any employee or member of the Pacifica Foundation's network is unacceptable and will subject the perpetrator to serious disciplinary action and possible criminal charges. Full language for this policy is available on request.

## GENERAL MEETINGS

Active KPFT programmers are encouraged to attend all general meetings. You are the heart, soul, and spirit of this station. It is important that you know what is going on and take part; you are also responsible for the material covered during the meetings.

To be considered a PSA, the events must be sponsored by a nonprofit, tax-exempt organization. Each on-air volunteer is expected to play two promos/PSAs per program.

## PUBLIC SERVICE ANNOUNCEMENTS (PSAS)

Either the General Manager or Program Director must approve PSA scripts. Scripts should be edited sparingly during production. The final cut must be listened to and approved by the GM or PD before airplay. Volunteers must follow the same process as the public (i.e. they must have scripts reviewed, etc.). PSAs will be preempted during pledge/fund drives. Programmers will be encouraged to air announcements during drives.

## PUBLIC EVENTS/POLITICAL ACTIVITY

The station's interest is nonpartisan. Volunteers must make clear to others that they represent only themselves. The station encourages all individuals within the community to be active in community events and issues. However, in representing the interests of the station, no volunteer shall join any organization or sign onto any proposition, petition, cause, or concern in the station's name or for identification purposes without written approval of the General Manager. Media credentials ("press badges") are reserved for KPFT News staff and volunteer reporters. Programmers needing media verification should arrange such through the Program Director.

## LEAVES OF ABSENCE

Leaves of absence are required when a programmer anticipates being unable to fill his/her air shift for longer than six programs or six calendar weeks, whichever is less. Programmers who wish to take a leave of absence must notify the Program Director at least two weeks in advance of the proposed leave and nominate a substitute. The Program Director reserves the right to approve the substitution. Extensions may be granted by the Program Director under exceptional circumstances.

## STATION ACCESS

**The building is open to the general public during regular business hours, Monday through Friday 10 a.m. through 6 p.m.** The building is *locked on holidays* and at all other times. Volunteers already in the building can admit volunteers whose job requires that they be in the building during off hours. A volunteer who admits anyone during off hours is responsible for the conduct of whomever they admit.

The programmer on duty is responsible for controlling access to the station, except by staff or persons authorized by staff to have keys. Such persons should let the programmer/engineer know when they are at the station. Authorized persons to enter the building include:

programmers who are preparing for a show; persons who have come to the station for a posted meeting; programmers who have received advanced clearance to use the production studio; invited guests who have made prior arrangements; and volunteers conducting station business, such as helping during pledge drive. Persons who otherwise have legitimate business at the station, such as volunteers signed up for production rooms or doing other station-related work, people attending meetings, and people to be interviewed or musicians who are to perform by producers, are to be admitted.

Packages addressed to individual programmers will be passed on to the appropriate programmer. However, solicited or not, mail is sent to the programmer as an agent of the station. Thus, mail arriving at KPFT or to other addresses under the auspices of the station, regardless of addressee, is the legal property of KPFT.

Guests who otherwise have legitimate business at the station may be admitted *if accompanied by their host or the host makes prior arrangements with the programmer/engineer*. Such guests are the responsibility of their host. Any other persons admitted are the responsibility of the programmer/engineer. These responsibilities include making sure they leave the building when the programmer/engineer does, unless the next programmer/engineer agrees to the visitor remaining in the building during his or her shift.

Any behavior by volunteers or their guests in violation of policies must be reported to staff. Failure to report will be considered a factor in any penalty assessed. Any person whose behavior immediately endangers the station or safety of any person at the station may be required to leave. Any such instance must be reported to staff as soon as possible.

All volunteers are responsible for taking reasonable steps because the safety and security of station facilities and equipment. As such, volunteers have the right and responsibility to question any stranger on the premises. Volunteers have the right to ask anyone to leave immediately who is disruptive, threatening, or behaving suspiciously. If any situation threatens the building or staff, or interferes with station control of the broadcast signal, volunteers are expected to request assistance from paid staff or the police.

Paid staff is responsible for unlocking the entrances at 10 a.m. and locking them after 6 p.m. on weekdays. The doors shall be locked at all times during weekends. Any volunteer who finds the doors unlocked during non-business hours must inform a paid staff member immediately.

## PRODUCTION ROOM

Volunteers are asked to maintain a sense of community when using the room. If a volunteer signs up and is unable to use the time, it is her or his responsibility to call the station and ask to be deleted from the schedule. If a volunteer believes a show will not be using its assigned time, it is the volunteer's responsibility to contact the show's producer before using the studio. If the volunteer cannot reach the producer, permission may be secured from paid staff. If another volunteer urgently needs the space for a few minutes, volunteers are urged to try to accommodate others, especially for those preparing shows that will air in the immediate future. The station reserves the right to displace any studio user for operational needs at any time.

Volunteers may not sign up for longer than three hours per day. Some shows are assigned production time on the permanent schedule.

## MUSIC ACQUISITION

Individual music programmers may be authorized by KPFT to contact music companies, agents, or artists in order to acquire music for the station that is appropriate for their shows. Volunteers who originate such contacts are expected to keep the Program Director informed of their activities. In making these contacts, volunteers who misrepresent their role at the station or make negative or derogatory statements about the station, staff, board, or other volunteers may be subject to disciplinary action. If any benefits, such as concert tickets or free CDs, become available related to these activities, the volunteer and the Program Director shall reach an agreement on the disposition of these perks, with final decision granted to the Program Director.

# ON-AIR GUIDELINES

## STATION IDENTIFICATION

A legal station identification is required within five minutes of the top or bottom of the hour. The legal ID consists of a station's call letters followed directly by its city of license. Our only legal ID is: **KPFT, Houston**. You can add things before or after the ID but you cannot divide it up.

## OBSCENITY

According to the FCC, the following three elements, while developed in reference to printed works, must be present in order for a work to be considered obscene:

- o Whether the average person, applying contemporary community standards, would find that the work, taken as a whole, appeals to the prurient interest; and
- o Whether the work depicts or describes, in a patently offensive way, sexual conduct specifically defined by the applicable state law; and
- o Whether the work, taken as a whole, lacks serious literary artistic, political, or scientific value (Thomas and Clifford, 1986:IV-6).

While creativity and provocative programming are encouraged, programmers must always remember that KPFT is in no position to take on the FCC. **Obscene material is not protected by the First Amendment and cannot lawfully be broadcast at any time. KPFT shall not broadcast obscene material at any time.**

## INDECENCY

While more information is now available about what constitutes indecency and what the federal consequences may be for stations that air indecent material, this remains a vague and complex subject. For many years, the prevailing standard for what constituted indecency stemmed from a 1977 landmark case involving the Pacifica radio station WBAI that aired George Carlin's recorded piece, "Filthy Words," at two o'clock in the afternoon. The FCC ruling against WBAI was ultimately upheld by the U.S. Supreme Court and effectively established the

list of the “seven dirty words” that stations long used to measure whether or not they were airing indecent material.

In its public memo distributed at the National Federation of Community Broadcasters (NFCB)’s 1998 Community Radio Conference, the legal firm of Haley Bader & Potts reported that, “*in 1987, the FCC replaced its ‘seven dirty words’ indecency standard with a ‘generic’ definition of indecency. Since then, the Commission has levied indecency fines amounting to millions of dollars*” (Haley Bader & Potts, 1998:1). The attorneys go on to present the current definition of indecency:

*The FCC considers a broadcast to be indecent if it contains “language or material that, in context, depicts or describes, in terms patently offensive as measured by contemporary standards for the broadcast medium, sexual or excretory activities or organs”* (Haley Bader & Potts, 1998:1).

In its *Public Radio Legal Handbook*, the NFCB points out that indecency is distinct from obscenity in two important ways.

*First, obscenity requires that the language in question appeal to the prurient interest; indecent language does not have to meet this test. In addition, indecent language ‘cannot be redeemed by a claim that it has literary, artistic, political, or scientific value’*” (Thomas and Clifford, 1986:IV-7).

Rather than censoring specific materials, the issue of indecency centers on protecting young people from inadvertently hearing explicit language or material. Radio is seen as an intrusive medium that requires much less deliberate selection than telephones, print media or even television. Radio permeates all aspects of people’s lives and accompanies us at home, on the road, at work and as we walk down the street. As such, unrestricted presentation of controversial material on the radio is far more likely to reach young people than through other media. Accordingly, FCC enforcement of indecency restrictions is far more common during those times when young people are apt to hear it. Haley Bader & Potts discuss concept of the “safe harbor”:

*The FCC enforces its indecency policy between the hours of 6:00 a.m. and 10:00 p.m. The hours between 10:00 p.m. and 6:00 a.m. are regarded as a "safe harbor" period during which indecent material may be aired. Material that is "obscene," rather than merely "indecent," may not be aired at any time... (Haley Bader & Potts, 1998:1).*

*The current policy of the FCC is to ban the broadcast of indecent material between the hours of 6:00 a.m. and 10 p.m. The courts have affirmed the right of the FCC to regulate the broadcast of indecent material even though they have struck down laws regulating the transmission of indecent material on the internet and on cable TV (Haley Bader & Potts, 1998:4).*

As is the case with many federally mandated regulations, the severity of penalties for violation are not so much for whether there was a random violation as much as for whether one or more violations were not addressed by the station at the time of their occurrence. In this vein, Haley Bader & Potts report:

*...The FCC doesn't ask stations to report indecent broadcasts, but it does expect them to take immediate remedial action. Fines may be substantially reduced if a station can show that it took unprompted disciplinary action against those who aired indecent material (Haley Bader & Potts, 1998:4).*

Accordingly, KPFT acknowledges the federal restrictions on indecency and will respond with disciplinary procedures in all cases. As a programmer you must always remain conscious of who is or may be listening and present appropriate material.

While the FCC currently prohibits the broadcast of indecent material from 6:00 a.m. to 10:00 p.m., **KPFT's policy is stricter and prohibits such broadcast from 5 a.m. to midnight.** Between the hours of midnight and 5:00 a.m. are considered "safe harbor" hours. A sensitive-language promo is to be aired before every show after midnight and before 5 a.m.

## PROFANITY

The NFCB's *Public Radio Legal Handbook* provides a clear discussion on profanity:

*Court cases have stated that in the case of language that might be characterized as profane - hell, damn, God damn, etc. - the key factor is the intention of the speaker. If the speaker's language was meant as "an imprecation of divine vengeance or implying divine condemnation, so used as to constitute a public nuisance," the language is considered profane. In other words, profane language occurs when someone who says God damn really means God damn. So while members of the public may find the use of such language, offensive, a complainant would have to prove the above intent to get a profanity ruling. It's generally assumed by the Commission that letter from the public to broadcasters serve as the most effective check with regard to such language (Thomas and Clifford, 1986:IV-7).*

Board operators may not use, nor allow their on-air guests or callers to use, profanity on the air. If a guest or caller uses offensive language, the operator must give them an immediate warning. Upon a second occurrence, the operator must cut that person off.

Occurrences of offensive language within coverage of a bona fide news event may be allowed to air outside the "safe harbor" period. News producers should use discretion and, if possible, clear the material with the Program Director. Programmers should use discretion about airing material of a particularly controversial nature or that contains extensive use of "offensive" language, and should take into account the musical and artistic content of the recording, the program context, and the likely audience.

All complaints received regarding controversial language or material should be given to the Program Director for documentation. Persons who violate any part of this policy must document occurrences.

## LIBEL/SLANDER

Another category of forbidden speech is Libel/Slander. In simplest terms, libel/slander is the knowing, negligent, and/or unguarded broadcast of false information that harms the reputation of, or causes shame or ridicule for, an individual, alive or dead, or organization in a way that causes actual injury in the form of financial loss, impairment of reputation, public scorn, or mental anguish and suffering. Libel/Slander is a violation of State and Federal law.

The FCC's personal attack rule is: if a broadcaster attacks the "honesty, character, or integrity" of an identified person or group while discussing a controversial issue of public importance, then that broadcaster must contact that person or group within a week, provide a script, tape, or accurate summary of the attack, and offer a reasonable opportunity to respond over the same station without charge. The FCC interprets the "personal" element of the rule strictly; attacks not going to personal character do not count (47 C.F.R. §§ 73.123, 73.300, 73.598, 73.679).

We are liable not only for things we say, but also things that are said by guests on our airwaves. Saying something that even approaches libel/slander can result in a long court battle. Err on the side of caution. KPFT holds personally liable any volunteer who defames (as defined by law) an individual. Liability includes but is not limited to any related expenses, charges, or fines.

## CALLS TO ACTION

As a programmer, you may **not** encourage listeners to take an action such as go to a specific event, purchase a specific product or shop at a specific place. Known as "calls to action," such promotions are forbidden. Examples include:

- o *"This is a great CD; you should go pick one up at Tower Records."*
- o *"The Music Festival is this weekend. Come on down; I'll see you there!"*
- o *"Rocko's Department Store is under a boycott; don't shop there!"*

## CONSIDERATION (PAYOLA/PLUGOLA)

By law, you cannot promote or endorse on the air any product, event, or activity that you might receive consideration from. In other words, if you receive money, products, or services from

someone, you cannot plug them on the air. In its extreme form, this is known as "payola" or "plugola." In any form, it's illegal.

Those who have any voice in the selection of broadcast matter is prohibited from engaging in any outside business activity that would create a conflict of interest in the selection of broadcast matter; accepting any money, favor, loan, entertainment or other thing of value, including sex or drugs, from any person who seeks in exchange the airing of any broadcast matter; or promoting over the air any activity or matter in which the employee has any direct or indirect financial interest. Potential conflicts of interest must be reported to management. Programmers or family members are prohibited from any ownership interest in, either direct or indirect (other than an investment in the stock of a publicly held company), or serving as an officer or director of, with or without compensation, any person, firm or corporation engaged in:

- o Publishing of music;
- o The production, distribution (including wholesale and retail sales outlets), manufacture or exploitation of music, tapes, recordings or electrical transcriptions of any program material intended for broadcast use;
- o Exploitation, promotion or management of persons rendering artistic, production and/or other services in the entertainment field;
- o Ownership or operation of one or more radio or television stations;
- o Wholesale or retail sale of records intended for public purchase;
- o Advertising on the station or any other station (excluding normal stockholdings in publicly owned companies).

**The primary issue is *acceptance of money, not necessarily profit.*** If you think your case could be cast in the worst light by a zealous district attorney, exercise caution. Consideration is illegal.

No person responsible for the broadcast of anything on KPFT shall accept any money, services or other compensation from any source except KPFT for the inclusion of any matter on KPFT. Spouses or family members are also prohibited from receiving or soliciting services or anything of value in exchange for influencing any decision as to what is aired on the station.

## POLITICAL CANDIDATES

As an individual, a volunteer may express editorial positions, or can allow guests or phone callers to express opinions. It is the on-air programmer's responsibility to make clear to the listeners that such opinions are those of the individuals and are not necessarily an editorial opinion of the station, its volunteers, paid staff or management. Advocacy for or against particular candidates, legislation, etc. is prohibited. A candidate form must be completed and submitted to the Program Director for entrance to KPFT's public file prior to the appearance of a candidate for elected office on any program. Programmers who are running for any political office must resign their air shift.

## COPYRIGHTED MATERIAL

It is legal to broadcast any material that has been commercially recorded, as long as there is no prohibition against airplay on the material. However, it is illegal to broadcast "bootleg" recordings or other non-commercial recordings without the written permission of the artist.

Regarding printed material that is to be read on the air, you must either obtain the written permission of the author or publisher, or you must adhere to the "fair use rule." The "fair use rule" demands that the material you read or quote on the air should not take away any of the financial value of the printed work. If you read the entire work, that can be construed as violating the "fair use rule." How much of the work you can read without violating the "fair use rule" is a matter of interpretation. When in doubt, get written permission.

## REBROADCASTS

The NFCB's Public Radio Legal Handbook states:

*As a general rule, a station may rebroadcast the programs of another broadcast station only if the originating station has given its written authority for such rebroadcast. A copy of the originating station's written consent must be kept by the licensee of the station that rebroadcasts the program and made available to the FCC upon request (Thomas and Clifford, 1986: IV-17).*

## TELEPHONE CONVERSATIONS

Before you live-broadcast a telephone conversation or record a telephone conversation for later broadcast, any and all parties taking part in the conversation must be notified of KPFT's intent to broadcast it. This is known as "prior notification" and must take place before any part of the conversation is broadcast or recorded.

Prior notification does not necessarily need to be made on-air. However, when spontaneously taking calls, such as during a phone-in program, you must notify each caller of your intent to broadcast the conversation before it begins. This can be accomplished by working with a second person who screens calls and notifies callers before they are patched on air. If you are working alone and are patching incoming calls directly on air, you must first notify each caller that the conversation is on the radio. As you patch each caller on air, you should begin your conversation by saying, "Hello, caller. You're on the air."

## DISCRIMINATORY BROADCASTING

It is forbidden to broadcast material that demeans, encourages hatred, or may lead to violence toward any individual or group based on age, race, religion, sex, sexual orientation or national origin.

## RELIGIOUS BROADCASTING

A programmer may not promote one religious belief over another, proselytize, or exhort others to embrace any particular religious point of view, deity or philosophy. This extends to promoting the necessity of a religious faith.

## ANNOUNCEMENTS

Volunteers also read announcements — but not endorsements — for concerts and events. In addition to standard disallowances, specific prohibitions regarding announcements include:

- o Volunteers must not announce prices on the air.
- o Volunteers may say the event involves a charge or a suggested donation but may not specify the amount unless the event is free. (Note: price may be mentioned in

announcements promoting events sponsored by and solely benefiting the station.)

- o Volunteers may announce but shall not promote an event in which they have a direct financial interest.

"Promoting" includes doing a special feature, an extended set, or a whole show on an artist or artists who will be performing at a profit-making concert or event, then announcing a call to action or supportive remarks, however casual.

## EVENT/SPEAKER PROMOTION

The station shall not knowingly promote (i.e., sponsor or co-sponsor, or actively promote tapes of) talks, performances, or appearances by anyone whose values are expressly inconsistent with those stated in the Pacifica Mission. This policy relates to those whose values are inconsistent with the mission in clear and documented manner, as opposed to differences in language, approach, politics or presentation. Volunteers and guests cannot be banned over such differences. However, in keeping with the value of free expression, the station shall treat a request for airtime by that person in the same manner as a request by anyone else. In the case of a controversy about a particular speaker, the Program Director shall consider an appropriate format for discussion.

## LISTENER CALLS/QUESTIONS

Listeners frequently call the station asking for information that has been announced on the air. The person who takes the call may choose to take a message or encourage the caller to call the receptionist for further details. If for some reason these solutions are not practical (the listener doesn't know what show it was, the event in question is before the programmer's next show, the programmer is on vacation, etc.), the person who takes the call may choose to look for the information using resources available at the station. If the person is too busy or the information is not readily available, politely thank the listener for calling and apologize for not being able to help the caller further, and take a message for follow-up by the Program Director. Do not give out volunteers' phone numbers or call programmers at home or work about announcements made during their shows. Volunteers are expressly forbidden from being rude to callers.

## ON-AIR CORRECTIONS

Listener feedback is essential to community radio, as is accuracy. Volunteers who receive listener feedback on the factual accuracy of content are obligated to transcribe the details of the incident, including time, date, program, and contact information of the complainant and deliver them to the Program Director for investigation. The Program Director, in consultation with the appropriate programmer, will investigate the matter and render a judgment on the complaint within seven days. If the information in question is found to be incorrect, the programmer must air a correction, explaining the complaint, the information originally provided, and the new information. The programmer will provide the on-air correction with regular intonation and without additional comment.

This policy does not extend to differences of opinion, divergent interpretations of factual, historical or other information or nuances in language, culture, etc. In addition, the Program Director may deem some inaccuracies to be minor enough to not air a correction.

## CALL-IN PROGRAM POLICY

Taking phone calls live allows us to encourage community and participation. Ultimately, the host has the power over the caller, and thus should use that power to be fair and inclusive.

### *Responsibilities:*

- o To take only as much information as needed. The only things we should ask callers are who they are and where they're calling from, and if they'd like to let the host know what topic they're calling on (i.e. to comment on another call, to mention a website pertinent to the discussion, etc.)
- o To take calls received, even if the host may personally disagree with the caller.
- o To encourage a diversity of voices in discussions.
- o Treat callers politely. Be courteous as possible to callers. Do not attack callers after they're off the air.

### *Rights:*

- o To remove callers who violate basic guidelines (see below).

- o To determine order of callers as appropriate for the show. This includes encouraging gender parity, holding regular callers for new callers, and moving up long-distance calls in priority. One may not leave a caller on hold because of their opinions.
- o To manage callers on air only in the interests of broadcast continuity. This means a host is allowed to remind a caller going off topic to speak on the program's topic.
- o To regulate calls fairly. Those callers who violate specific call policies should be given a warning and only sanctioned after subsequent violations.

*Basic guidelines for callers:*

- o No ad hominem attacks.
- o Add to the discussion/debate (don't repeat the same points already made).
- o No FCC-regulated profanity or violations of federal guidelines (e.g. indecency).
- o Comments that violate the Pacifica Mission or Code of Conduct (host should be able to cite what points of the Mission or Code were violated).
- o Getting on the air under false pretenses (such as making up one's name).
- o Making a speech instead of having a conversation (judgment of the host).

After the caller is removed, the host should explain that the caller was removed, the guidelines covering such issues, and that those with questions may contact the Program Director during business hours on the office line if there are questions.

## ON-AIR CRITICISM

Programmers are asked to consider the station's mission and the effect upon listeners of airing complaints about the equipment or facilities, or of commenting negatively about staff, volunteers, events or policies. In some cases, such actions are subject to disciplinary action.

Personal attacks will not be tolerated. The station holds personally liable any volunteer who defames (as defined by law) an individual. Liability includes, but is not limited to, any related expenses, charges or fines.

In the event of public concern regarding internal KPFT/Pacifica matters, separate programming, with a structured and fair format to be authorized and supervised directly by the

general manager, may be produced. If events warrant, the KPFT news department shall be permitted to cover internal KPFT/Pacifica issues in the same fair and balanced manner that it approaches any news story, making sure employee confidentiality is not breached. If necessary, an ombudsman will be appointed by the general manager, with input from the staff, to render impartial editorial supervision of such coverage.

## PENALTIES

The GM and/or the PD will administer disciplinary action for programming-related violations of federal regulations or KPFT station policy. In the case of a violation, a letter will be written noting the violation and will be entered into the programmer's file. KPFT regards violations of policies as a serious matter. KPFT also recognizes that, as a community station, volunteers can make errors in this regard.

The GM will administer disciplinary action for non-programming-related violations of Federal regulations or KPFT station policy. In the case of a violation, a letter will be written noting the violation and will be entered into the programmer's file.

- o First violation: Verbal warning, with written notation in files
- o Second violation: Written warning of further disciplinary action, and suspension of individual programmer for four programs
- o Third violation: Suspension of individual programmer and producer for six programs
- o Fourth violation: Termination of program

All cases and penalties are at the discretion of the General Manager and/or Program Director. Extenuating circumstances, for or against a penalty, may be considered by the General Manager and/or Program Director.

# PREEMPTION/SUBSTITUTION POLICY

Decisions to interrupt regular programming are made in the best interests of the community. Preemptions and substitutions should always be attempted in a spirit of cooperation.

## *Definitions*

- o Preemption—The interruption or replacement of regularly scheduled programming for breaking news or substitution.
- o Breaking News—Breaking news shall consist of special programming that the paid programming staff deems necessary to air. Any program completed more than 48 hours in advance shall not be considered breaking news. Any event central to the program that occurred more than 10 days ago is not considered breaking news. The Program Director and/or General Manager will review all breaking news and decide when programming will be interrupted.
- o Substitution—The temporary replacement of regular programming by special programming. Substitutions may address events that happened more than 10 days ago.
- o News Programming—For the purposes of this policy, news programming shall be considered distinct from public affairs programming and shall consist of reporting and/or analysis of current events. "Current" shall mean that the event central to the program has occurred within 10 days of substitution.
- o Public Affairs Programming—Public affairs programming shall consist of all other non-music programs that do not contain material related to current events.
- o Live Music Programming—Programming aired as the music is being performed. A taped program of a live performance shall not be considered live music programming.

## *Preemptions*

- o Breaking News—Paid programming staff can preempt any air shift in full or in part to allow the station to air breaking news programs. The staff must personally notify a volunteer as soon as possible after the decision to preempt has been made. Preemptions can be made with no prior notice.
- o A volunteer cannot refuse a decision to preempt for breaking news.

### *Substitutions*

- o Special News Programming and Live Music Specials—Programming staff may require the substitution of any air shift in full or in part.
- o Special Public Affairs Programming and Taped Music Specials—Programming staff can request the substitution of any air shift in full or in part.

### *Notification Requirements*

- o Preemption—No prior notice is required for preemptions, though advance notice shall be given whenever possible.
- o Substitution—Paid staff must notify the affected programmer(s) a minimum of 14 days prior to the start of any substitution.

Off-air time due to power outages, equipment malfunctions, occasional testing and maintenance of equipment that may require KPFT to go off the air are not preemptions.

### *Volunteer Responsibilities during Affected Air Shifts*

If more than 75 percent of an air shift is replaced by a preemption or substitution, the programmer for the air shift is no longer responsible for any aspect of that airtime. In such a case, the volunteer may be invited to fill special assignments, but has the right to decline. If less than 75 percent of an air shift is replaced by a preemption or substitution, the programmer is responsible for the remainder of her or his air shift. The volunteer programmer is not responsible for engineering the special programming portion unless she or he has agreed to this task. For live events where it may be unclear how much of an air shift is going to be replaced by a preemption, the volunteer programmer is required to remain available to complete her or his shift unless relieved of duty by a staff member or a substitute designated by the paid staff.

### *Promotion*

Producers are required to turn in promotion copy with their request for substitutions, preemptions and all other special programming. Paid staff must ensure the vigorous promotion of special programming with recorded announcements, and interrupt the special program periodically to explain that the substitution is temporary and state when the regular programming will return to the air.