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001	Email	Centers - To: Don R. Willett - From: Roberta Shea	1	10/10/2001	P5;
002	List	OFBCI Brainstorming	3	10/05/2001	P5;
003	List	OFBCI - 2001 and Beyond	1	N.D.	P5;
004	Q & A	The Administration's budget proposes that the BOP will operate four multi-faith based rehabilitation programs.	1	N.D.	P5;
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COLLECTION TITLE:

Faith-Based & Community Initiatives, White House Office of

SERIES:

Willett, Don R. - General Files

FOLDER TITLE:

[Correspondence] [Folder 3] [2]

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Freedom of Information Act - [5 U.S.C. 552(b)]

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United States
Department of
Agriculture

Forest
Service

Washington Office

14th & Independence SW
P.O. Box 96090
Washington, DC 20090

File Code: 2720

Date: November 15, 2001

Mr. Edward Correia
Latham & Watkins
555 Eleventh Street, N.W.
Suite 1000
Washington, D.C. 20004-1304

Dear Mr. Correia:

This letter is in response to your July 25, 2001, letter to Chief Dale Bosworth, and a followup of our letter to you dated August 27, 2001, concerning the Forest Service's policy for waiving rental fees for noncommercial, educational, sectarian broadcasters on National Forest System lands.

In our August 27, 2001, letter we informed you that we had forwarded your request to the Office of the General Counsel (OGC) for legal advice on our current fee waiver policy. We are in receipt of OGC's opinion. Based on that opinion, we will be revising our current policy to waive rental fees for all noncommercial, educational licensed broadcasters, including those noncommercial, educational broadcasters whose programming is sectarian in nature.

This fee waiver applies directly to those noncommercial, educational broadcasters to whom we have issued a Forest Service lease or special use permit to occupy National Forest System lands for communications uses. Additionally, in accordance with our policy for determining rental fees for communications uses, we will not include in the rental calculation for facility owners and managers, entities in their facilities that are noncommercial, educational, sectarian broadcast uses.

For your convenience, we have included a copy of the memo to our field units directing them to waive rental fees for noncommercial, educational, sectarian broadcasters and instructions for implementing these changes in billing years 2002 and beyond.

If you have any questions, please feel free to contact Mark Scheibel on the Lands Staff. He may be reached at (202) 205-1264.

Sincerely,

/s/Gregory Smith
for
JACK L. CRAVEN
Director of Lands





File Code: 2700

Date: November 15, 2001

Route To:

Subject: Rental Fee Waivers for Nonprofit, Educational Sectarian Radio and Television Broadcasters

To: Regional Foresters

Our current rental fee waiver policy allows for a full waiver for Public Broadcasting Service (PBS) and National Public Radio (NPR) stations that are licensed by the Federal Communications Commission (FCC) as noncommercial, educational broadcasters, but does not provide for fee waiver for sectarian broadcasters. Sectarian broadcasters, as defined in our current fee waiver policy, include those television and radio stations whose programming promotes a particular belief, ideology, or cause.

This fee waiver policy was recently challenged by Calvary Chapel of Costa Mesa, Inc., representing approximately 260 Calvary Satellite Network (CSN) stations and translators nationwide. Based on the information provided by CSN, we have determined that CSN is a nonprofit corporation as defined under section 501(c)(3) of the Internal Revenue Code and is licensed by the FCC as a noncommercial, educational broadcaster. As a result of CSN's challenge, we asked the Office of the General Counsel to review our fee waiver policy as it pertains to sectarian broadcasters, noting the legal objections raised by Calvary Chapel and recent case law. Based on this review, we are modifying our current fee waiver policy to provide a full rental fee waiver to those television and radio broadcasters that are licensed by the FCC as noncommercial, educational television or radio broadcasters and have nonprofit status as defined in section 501(c)(3) of the Internal Revenue Code. Sectarian broadcasters that meet both of these criteria will be granted a full fee waiver of their communications site rental fee. This change in policy is effective immediately, and will be published soon as an interim directive (ID).

Prior to issuance of that ID, follow these procedures for implementation of fee waivers for sectarian broadcasters that meet the fee waiver criteria for billing years 2002 and beyond:

1. CSN Lessees or Permit Holders. Grant a full fee waiver for billing year 2002 to CSN facility owners or managers that have a Forest Service lease or special use permit to occupy National Forest System (NFS) lands for communications purposes, and who appear in enclosure 1, CSN station listing. Fee waivers for billing years 2003 and beyond will require annual documentation from the holder of its nonprofit status as defined in section 501(c)(3) of the Internal Revenue Code and of its classification by the FCC as a noncommercial, educational broadcaster.

Regional Foresters

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2. Non-CSN Sectarian Lessees or Permit Holders. Noncommercial, educational sectarian broadcasters that are not affiliated with CSN and that hold leases or permits will be granted a full fee waiver for billing year 2002 upon submission by February 1, 2002, of documentation of their nonprofit status under section 501(c)(3) of the Internal Revenue Code and classification by the FCC as a noncommercial, educational radio or television station. Fee waivers for billing years 2003 and beyond will require annual documentation from the holder of its nonprofit status as defined in section 501(c)(3) of the Internal Revenue Code and of its classification by the FCC as a noncommercial, educational broadcaster.

3. Noncommercial, Educational Sectarian Broadcasters That Sublease Space in Communications Site Facilities on NFS Lands From Other Entities. Inform the facility owners and managers that the Forest Service has changed its rental fee waiver policy for noncommercial, educational sectarian broadcasters (a sample letter to facility owners and managers is included as enclosure 2). Indicate that:

- ! The CSN broadcast or translator uses (see enclosure 1, CSN station listing) that appear in the current certified facility inventory (provided to the authorized officer by October 15, 2001) will not be included in the rental fee calculation for their communications site facility for billing year 2002. Exclusion from rental fee calculations for CSN sectarian broadcasters for billing years 2003 and beyond will require annual documentation from the facility owner or manager that the CSN broadcaster meets the fee waiver criteria.
- ! Other noncommercial, educational sectarian broadcast or translator uses that are not affiliated with CSN and are located in their facilities will be considered for exclusion from their rental fee calculation in billing year 2002 upon submission by February 1, 2002, of documentation from that facility owner or manager of the broadcasters= nonprofit status as defined in section 501(c)(3) of the Internal Revenue Code and of their classification by the FCC as a noncommercial, educational broadcaster. Exclusion from rental fee calculations for non-CSN sectarian broadcasters for billing years 2003 and beyond will require annual documentation from the facility owner or manager that the broadcaster meets the fee waiver criteria.

Please keep in mind that not all sectarian broadcasters are licensed by the FCC as noncommercial, educational radio or television stations. There are sectarian broadcasting stations that are licensed as full-service radio or television stations and that routinely carry commercial advertisements. For commercial sectarian broadcasters that hold a Forest Service lease or permit, charge the full rental fee for their type of use and community served as provided in the Communications Site Rental Fee Schedule (FSH 2709.11, sec. 36). For commercial

sectarian broadcasters that are tenants in a communications site facility, include the charge for their use in the rental fee calculation for the facilities in which they are located as provided for in our policy for determining rental fees for communications facilities.

If you have any questions or need further assistance in connection with this matter, please contact Mark Scheibel of the Lands Staff in the Washington Office at (202) 205-1264.

/s/Gregory Smith
for
JACK L. CRAVEN
Director of Lands

Enclosures (2)

cc: Edward Correia, Latham & Wakins

Stanley Carlson-Thies, Office of Faith-Based and Community Initiatives, The White House

FS:LANDS:SCHEIBEL:ADMIN_SERVICES:CORRESPONDENCE:NON_CONGRESSIONA
L:2700:SECTARIAN_FEE_WAIVERS:F-1:jw:11/15/01

ENCLOSURE 1

Listing of Calvary Satellite Network Stations and Translators

By Timezone

ALASKA

CALL	City, State	Freq	Broadcasting	Type of Station
<u>K209CG</u>	Kenai, AK	89.7 mhz	CSN Full Time	Translator
<u>K216DG</u>	Ketchikan, AK	91.1 mhz	CSN Full Time	Translator
<u>K216DF</u>	Kodiak, AK	91.1 mhz	CSN Full Time	Translator
<u>K220FW</u>	Seldovia, AK	91.9 mhz	CSN Full Time	Translator
<u>K220FY</u>	Sitka, AK	91.9 mhz	CSN Full Time	Translator

CENTRAL

CALL	City, State	Freq	Broadcasting	Type of Station
<u>K205ED</u>	Aberdeen, SD	88.9 mhz	CSN Full Time	Translator
<u>K204CN</u>	Branson, MO	88.7 mhz	CSN Full Time	Translator
<u>K212DG</u>	Bushland/Amarillo, TX	90.3 mhz	CSN Full Time	Translator
<u>K208DS</u>	Cherokee, IA	89.5 mhz	CSN Full Time	Translator
<u>W215BE</u>	D'iberville, MS	90.9 mhz	CSN Full Time	Translator
<u>W209BM</u>	De Pere, WI	89.7 mhz	CSN Full Time	Translator
<u>W213BI</u>	Decatur, IL	90.5 mhz	CSN Full Time	Translator
<u>KDKR</u>	DECATUR/DALLAS, TX	91.3 mhz	CSN-Full	FM Stations
<u>K206BW</u>	Des Moines, IA	89.1 mhz	CSN Full Time	Translator
<u>W204BP</u>	Eau Claire, WI	88.7 mhz	CSN Full Time	Translator
<u>KELP</u>	EL PASO, TX	1590 khz	CSN Partial	AM Stations

<u>K205CT</u>	Emporia, KS	88.9 mhz	CSN Full Time Translator
<u>K214DG</u>	Fayetteville/Springdal	90.7 mhz	CSN Full Time Translator
<u>KTBJ</u>	FESTUS/ST LOUIS, MO	89.3 mhz	CSN Full Time FM Stations
<u>K220HX</u>	Franklin, NE	91.9 mhz	CSN Full Time Translator
<u>K201EL</u>	Gardendale/Midland, TX	88.1 mhz	CSN Full Time Translator
<u>K209DS</u>	Grand Rapids, MN	89.7 mhz	CSN Full Time Translator
<u>W205AS</u>	Gulf Breeze, FL	88.9 mhz	CSN Full Time Translator
<u>W216BW</u>	Hamburg/Louisville, IN	91.1 mhz	CSN Full Time Translator
<u>W209BL</u>	Huntsville, AL	89.7 mhz	CSN Full Time Translator
<u>K201DL</u>	Hutchinson, KS	88.1 mhz	CSN Full Time Translator
<u>W220CC</u>	Johnsonville, TN	91.9 mhz	CSN Full Time Translator
<u>K207BT</u>	Joplin, MO	89.3 mhz	CSN Full Time Translator
<u>K202DN</u>	Lafayette, LA	88.3 mhz	CSN Full Time
<u>W206AI</u>	Lake Villa, IL	89.1 mhz	CSN Full Time Translator
<u>W214BN</u>	Malbis, AL	90.7 mhz	CSN Full Time Translator
<u>W215BF</u>	Manitowoc, WI	90.9 mhz	CSN Full Time Translator
<u>K218CE</u>	Marshalltown, IA	91.5 mhz	CSN Full Time Translator
<u>W211AY</u>	Menomonie, WI	90.1 mhz	CSN Full Time Translator
<u>W217AQ</u>	Meridian, MS	91.3 mhz	CSN Full Time Translator
<u>K201 FL</u>	Mount Vernon, IL	88.1 mhz	CSN Full Time Translator
<u>K218CF</u>	New Braunfels, TX	91.5 mhz	CSN Full Time Translator
<u>K207BZ</u>	Odessa, TX	89.3 mhz	CSN Full Time Translator
<u>K208CG</u>	Oklahoma City, OK	89.5 mhz	CSN Full Time Translator

<u>K211DS</u>	Paris, TX	90.1 mhz	CSN Full Time Translator
<u>K220GL</u>	Pleasanton, TX	91.9 mhz	CSN Full Time Translator
<u>KSGR</u>	PORTLAND/CORPUS	91.1 mhz	CSN-Full FM Stations
<u>W219CV</u>	Raymond/Jackson, MS	91.7 mhz	CSN Full Time Translator
<u>K204DT</u>	Rogersville, MO	88.7 mhz	CSN Full Time Translator
<u>K204DX</u>	San Antonio, TX	88.7 mhz	CSN Full Time Translator
<u>W204BK</u>	Sherwood, WI	88.7 mhz	CSN Full Time Translator
<u>K211DE</u>	Sioux Falls, SD	90.1 mhz	CSN Full Time Translator
<u>K220FX</u>	St. Joseph, MO	91.9 mhz	CSN-KRSS Translator
<u>KRSS</u>	TARKIO, MO	93.5 mhz	CSN-FULL FM Stations
<u>K205CS</u>	Topeka, KS	88.9 mhz	CSN Full Time Translator
<u>W216AZ</u>	Waynesboro, MS	91.1 mhz	CSN Full Time Translator
<u>K204DQ</u>	Wichita, KS	88.7 mhz	CSN Full Time Translator
<u>K201FJ</u>	Williston, ND	88.1 mhz	CSN Full Time Translator

EASTERN

CALL	City, State	Freq	Broadcasting	Type of Station
<u>W219CN</u>	Albrightsville, PA	91.7 mhz	CSN Full Time	Translator
<u>W201BJ</u>	Athens, GA	88.1 mhz	CSN Full Time	Translator
<u>WJCX</u>	BANGOR/PITTSFIELD, ME	99.5 mhz	CSN Full Time	FM Stations
<u>W203BA</u>	Blue Ridge, GA	88.5 mhz	CSN Full Time	Translator
<u>W219CB</u>	Bluffton/Hilton Head,	91.7 mhz	CSN Full Time	Translator
<u>W204BH</u>	Boones Mill, VA	88.7 mhz	CSN Full Time	Translator
<u>W218BK</u>	Brunswick, GA	91.5 mhz	CSN Full Time	Translator

<u>W201BE</u>	Buffalo, NY	88.1 mhz	CSN Full Time	Translator
<u>W201CC</u>	Buford, GA	88.1 mhz	CSN Full Time	Translator
<u>W220BT</u>	Cape May, NJ	91.9 mhz	CSN Full Time	Translator
<u>W203AX</u>	Caro/Vassar, MI	88.5 mhz	CSN Full Time	Translator
<u>W205BJ</u>	Charleston, SC	88.9 mhz	CSN Full Time	Translator
<u>W203BG</u>	Conway, SC	88.1 mhz	CSN Full Time	Translator
<u>W220DC</u>	Danbury, NC	91.9 mhz	CSN Full Time	Translator
<u>W246AP</u>	Dansville, NY	97.1 mhz	CSN-WZXV	Translator
<u>WREQ-FM</u>	Elmira/Ridgebury, PA	96.9 mhz	CSN-Full	Translator
<u>W220CD</u>	Enka, NC	91.9 mhz	CSN Full Time	Translator
<u>WFGL</u>	FITCHBURG, MA	960 khz	CSN Full Time	AM Stations
<u>W206AR</u>	Florence, SC	89.1 mhz	CSN Full Time	Translator
<u>W277AK</u>	Fort Wayne, IN	103.3 mhz	CSN-WQKO	Translator
<u>W217BC</u>	Fredericksburg, VA	91.3 mhz	CSN Full Time	Translator
<u>W220CS</u>	Frogmore/Beaufort, SC	91.9 mhz	CSN Full Time	Translator
<u>W206AY</u>	Fruitland/Salisbury,	89.1 mhz	CSN Full Time	Translator
<u>W203AY</u>	Golden Lakes, FL	88.5 mhz	CSN Full Time	Translator
<u>W213BD</u>	Greenville, SC	90.5 mhz	CSN Full Time	Translator
<u>W205AT</u>	Hamler, OH	88.9 mhz	CSN Full Time	Translator
<u>W207BA</u>	Hammett/Erie, PA	89.3 mhz	CSN Full Time	Translator
<u>WQKO</u>	HOWE, IN	91.9 mhz	CSN Full Time	FM Stations
<u>W247AM</u>	Kalamazoo, MI	97.3 mhz	CSN-WQKO	Translator
<u>W218BH</u>	Key West, FL	91.5 mhz	CSN Full Time	Translator

<u>W204AL</u>	Kingstree, SC	88.7 mhz	CSN Full Time	Translator
<u>W218BM</u>	Lakeside/Richmond, VA	91.5 mhz	CSN Full Time	Translator
<u>W229AE</u>	Lynchburg, VA	93.7 mhz	CSN Full Time	Translator
<u>W202BC</u>	Macon, GA	88.3 mhz	CSN Full Time	Translator
<u>W204AZ</u>	Madison Heights, VA	88.7 mhz	CSN/WPVA	Translator
<u>W220BX</u>	Marietta, PA	91.9 mhz	CSN Full Time	Translator
<u>W201BN</u>	Milledgeville, GA	88.1 mhz	CSN Full Time	Translator
<u>W300AL</u>	Mishawaka, IN	107.9 mhz	CSN-WQKO	Translator
<u>W208BA</u>	Myrtle Beach, SC	89.5 mhz	CSN Full Time	Translator
<u>WJLT</u>	NADDICK-BOSTON, MA	1060 khz	CSN Partial	AM Stations
<u>WJIJ</u>	NORLINA, NC	94.3 mhz	CSN Full Time	FM Stations
<u>W203BB</u>	Norwalk, CT	88.5 mhz	CSN Full Time	Translator
<u>W216BM</u>	Okolona, KY	91.1 mhz	CSN Full Time	Translator
<u>W214AR</u>	Oswego, NY	90.7 mhz	CSN Full Time	Translator
<u>W203BJ</u>	Panama City, FL	88.5 mhz	CSN Full Time	Translator
<u>W205BP</u>	Pemberville, OH	88.9 mhz	CSN Full Time	Translator
<u>WPGT</u>	ROANOKE RAPIDS, NC	91.1 mhz	CSN-Full	FM Stations
<u>WZXV</u>	ROCHESTER, NY	99.7 mhz	CSN Partial	FM Stations
<u>W206AT</u>	Savannah, GA	89.1 mhz	CSN Full Time	Translator
<u>W213BE</u>	Snellville, GA	90.5 mhz	CSN Full Time	Translator
<u>W215AV</u>	South Portsmouth, KY	90.9 mhz	CSN Full Time	Translator
<u>W218BD</u>	Southwest Harbor, ME	91.5 mhz	CSN Full Time	Translator
<u>W216BQ</u>	Thomasville, GA	91.1 mhz	CSN Full Time	Translator

<u>W264AK</u>	Toledo, OH	100.7 mhz	CSN Full Time	Translator
<u>W214AS</u>	Waleska, GA	90.7 mhz	CSN Full Time	Translator
<u>W214AY</u>	Walker/Grand Rapids,	90.7 mhz	CSN Full Time	Translator
<u>W202BA</u>	Warner Robins, GA	88.3 mhz	CSN Full Time	Translator
<u>WANR</u>	WARREN, OH	1570 khz	CSN Partial	AM Stations
<u>WPVA</u>	WAYNESBORO, VA	90.1 mhz	CSN Full Time	FM Stations
<u>W215BO</u>	Westport, KY	90.9 mhz	CSN Full Time	Translator

HAWAII

CALL	City, State	Freq	Broadcasting	Type of Station
<u>K201FQ</u>	Hilo, HI	88.1 mhz	CSN Full Time	Translator
<u>K208CU</u>	Kailua-Kona, HI	89.5 mhz	CSN Full Time	Translator
<u>K220HA</u>	Kihei, HI	91.9 mhz	CSN Full Time	Translator
<u>KHJC</u>	LIHUE, HI	88.9 mhz	CSN Full Time	FM Stations

MOUNTAIN

CALL	City, State	Freq	Broadcasting	Type of Station
<u>K216EA</u>	Alamogordo, NM	91.1 mhz	CSN Full Time	Translator
<u>K212DR</u>	Albion/ Burley, ID	90.3 mhz	CSN Full Time	Translator
<u>K206CX</u>	Ammon/ Idaho Falls, ID	89.1 mhz	CSN Full Time	Translator
<u>K215DL</u>	Billings, MT	90.9 mhz	CSN Full Time	Translator
<u>K294AE</u>	Boise, ID	106.7 mhz	CSN Full Time	Translator
<u>K215DV</u>	Box Elder/Rapid City,	90.9 mhz	CSN Full Time	Translator
<u>K238AG</u>	Cascade, ID	95.5 mhz	CSN Full Time	Translator

<u>K203DT</u>	Cheyenne, WY	88.5 mhz	CSN Full Time Translator
<u>K206CY</u>	Chubbuck/ Pocatello,	89.1 mhz	CSN Full Time Translator
<u>K220HI</u>	Clarkston/Logan, UT	91.9 mhz	CSN Full Time Translator
<u>K201FG</u>	Culbertson, MT	88.1 mhz	CSN Full Time Translator
<u>K201FN</u>	Dickinson, ND	88.1 mhz	CSN Full Time Translator
<u>K213DC</u>	Ephraim, UT	90.5 mhz	CSN Full Time Translator
<u>K209DC</u>	Evanston, WY	89.7 mhz	CSN Full Time Translator
<u>K201DO</u>	Farmington, NM	88.1 mhz	CSN Full Time Translator
<u>K203DA</u>	Fort Morgan, CO	88.5 mhz	CSN Full Time Translator
<u>K216DX</u>	Gallatin	91.1 mhz	CSN Full Time Translator
<u>K201DW</u>	Gallup, NM	88.1 mhz	CSN Full Time Translator
<u>KLWD</u>	GILLETTE, WY	91.9 mhz	CSN-Full FM Stations
<u>K215CW</u>	Glendive, MT	90.9 mhz	CSN Full Time Translator
<u>K205CK</u>	Grand Junction, CO	88.9 mhz	CSN Full Time Translator
<u>K201DC</u>	Great Falls, MT	88.1 mhz	CSN Full Time Translator
<u>K204CX</u>	Hamilton, MT	88.7 mhz	CSN Full Time Translator
<u>K215CG</u>	Helena, MT	90.9 mhz	CSN Full Time Translator
<u>K201EY</u>	Kalispell, MT	88.1 mhz	CSN Full Time Translator
<u>K203DS</u>	Ketchum, ID	88.5 mhz	CSN Full Time Translator
<u>K211EI</u>	Lamar, CO	90.1 mhz	CSN Full Time Translator
<u>K206BS</u>	Laramie, WY	89.1 mhz	CSN Full Time Translator
<u>K208EJ</u>	Las Cruces, NM	89.3 mhz	CSN Full Time Translator
<u>K204DF</u>	Missoula, MT	88.7 mhz	CSN Full Time Translator

<u>K201CW</u>	Moab, UT	88.1 mhz	CSN Full Time Translator
<u>K213CK</u>	Montrose, CO	90.5 mhz	CSN Full Time Translator
<u>K272DV</u>	Mountain Home, ID	102.3 mhz	CSN Full Time Translator
<u>K219DW</u>	Norfolk, NE	91.7 mhz	CSN Full Time Translator
<u>KRTK</u>	POCATELLO, ID	1490 khz	CSN Partial AM Stations
<u>K213DR</u>	Polson, MT	90.5 mhz	CSN Full Time Translator
<u>K220FT</u>	Portales, NM	91.9 mhz	CSN Full Time Translator
<u>K202CC</u>	Provo, UT	88.3 mhz	CSN Full Time Translator
<u>K212EW</u>	Roswell, NM	90.3 mhz	CSN Full Time Translator
<u>K213CQ</u>	Salt Lake City, UT	90.5 mhz	CSN Full Time Translator
<u>K212EJ</u>	Scottsbluff, NE	90.3 mhz	CSN Full Time Translator
<u>K201DP</u>	St. George, UT	88.1 mhz	CSN Full Time Translator
<u>K203DD</u>	Sterling, CO	88.5 mhz	CSN Full Time Translator
<u>K203CQ</u>	Tooele, UT	88.5 mhz	CSN Full Time Translator
<u>KAWZ</u>	TWIN FALLS, ID	89.9 mhz	CSN Full Time FM Stations
<u>K201FT</u>	Wellsville, UT	88.1 mhz	CSN Full Time Translator
<u>K220IJ</u>	Yuma, CO	91.9 mhz	CSN Full Time Translator

PACIFIC

CALL	City, State	Freq	Broadcasting	Type of Station
<u>K201DM</u>	Aberdeen, WA	88.1 mhz	CSN Full Time	Translator
<u>K244DE</u>	Arroyo Grande etc., CA	96.7 mhz	CSN Full Time	Translator
<u>K201EH</u>	Baker City, OR	88.1 mhz	CSN Full Time	Translator

<u>K212BD</u>	Barstow, CA	90.3 mhz	CSN Full Time	Translator
<u>K220HU</u>	Battle Mountain, NV	91.9 mhz	CSN Full Time	Translator
<u>KAEH</u>	BEAUMONT, CA	100.9 mhz	CSN Partial	FM Stations
<u>K201FH</u>	Bellingham, WA	88.1 mhz	CSN Full Time	Translator
<u>K266AH</u>	Bena, CA	101.1 mhz	CSN Full Time	Translator
<u>K211CT</u>	Bend, OR	90.1 mhz	CSN Full Time	Translator
<u>K212DF</u>	Bend/Red Bluff, CA	90.3 mhz	CSN Full Time	Translator
<u>K204CH</u>	Bishop, CA	88.7 mhz	CSN Full Time	Translator
<u>K211DV</u>	Black Canyon City, AZ	90.1 mhz	CSN Full Time	Translator
<u>K209CY</u>	Blythe, CA	89.7 mhz	CSN Full Time	Translator
<u>K217EL</u>	Borrego Springs, CA	91.3 mhz	CSN Full Time	Translator
<u>K205DD</u>	Bremerton, WA	88.9 mhz	CSN Full Time	Translator
<u>K201DV</u>	Brookings, OR	88.1 mhz	CSN Full Time	Translator
<u>K217EA</u>	Brownsville, CA	91.3 mhz	CSN Full Time	AM Stations
<u>K203CU</u>	Burney, CA	88.5 mhz	CSN Full Time	Translator
<u>K203CW</u>	Burns, OR	88.5 mhz	CSN Full Time	Translator
<u>K207DN</u>	Byron/Stockton, CA	89.3 mhz	CSN Full Time	Translator
<u>K220GI</u>	Camp Verde/Cottonwood,	91.9 mhz	CSN Full Time	Translator
<u>K201EW</u>	Canyonville, OR	88.1 mhz	CSN Full Time	Translator
<u>K205DO</u>	Cape George/Port	88.9 mhz	CSN Full Time	Translator
<u>K259AK</u>	Carson City, NV	99.7 mhz	CSN Full Time	Translator
<u>K219CL</u>	Cave Junction, OR	91.7 mhz	CSN Full Time	Translator
<u>K220HE</u>	Chehalis, WA	91.9 mhz	CSN Full Time	Translator

<u>K206CE</u>	Chester, CA	89.1 mhz	CSN Full Time Translator
<u>K206CL</u>	Chinook/Astoria, WA	89.1 mhz	CSN Full Time Translator
<u>K218DF</u>	Cle Elum, WA	91.5 mhz	CSN Full Time Translator
<u>K212DJ</u>	Clearlake, CA	90.3 mhz	CSN Full Time Translator
<u>K220IL</u>	Clifton, AZ	91.9 mhz	CSN Full Time Translator
<u>K214CW</u>	Coalinga, CA	90.7 mhz	CSN Full Time Translator
<u>K216EH</u>	Colton/Portland, OR	91.1 mhz	CSN Full Time Translator
<u>K212FG</u>	Coos Bay, OR	90.3 mhz	CSN Full Time Translator
<u>K212AK</u>	Corvallis, OR	90.3 mhz	CSN Full Time Translator
<u>K207CE</u>	Cottonwood/Redding, CA	89.3 mhz	CSN Full Time Translator
<u>K272AY</u>	Crescent City, etc.,	102.3 mhz	CSN Full Time Translator
<u>K288DR</u>	Desert Hot	105.5 mhz	CSN-KRTM Translator
<u>K235AG</u>	Dorris, CA	94.9 mhz	CSN Full Time Translator
<u>K214DM</u>	Durham/Chico, CA	90.7 mhz	CSN Full Time Translator
<u>K220HG</u>	Elko, NV	91.9 mhz	CSN Full Time Translator
<u>K205DF</u>	Enumclaw, WA	88.9 mhz	CSN Full Time Translator
<u>K216ET</u>	Etna, WA	91.1 mhz	CSN Full Time Translator
<u>K216EG</u>	Eufaula/Longview, WA	91.1 mhz	CSN Full Time Translator
<u>K203BT</u>	Eugene, OR	88.5 mhz	CSN Full Time Translator
<u>k229AF</u>	Eureka, CA	93.7 mhz	CSN Full Time Translator
<u>K220HD</u>	Fall City/Issaquah, WA	91.9 mhz	CSN Full Time Translator
<u>K211DG</u>	Firebaugh, CA	90.1 mhz	CSN Full Time Translator
<u>K204DP</u>	Florence, OR	88.7 mhz	CSN Full Time Translator

<u>K201FD</u>	Forks, WA	88.1 mhz	CSN Full Time Translator
<u>K203BU</u>	Garberville, CA	88.5 mhz	CSN Full Time Translator
<u>K205DM</u>	Glide, OR	88.9 mhz	CSN Full Time Translator
<u>K201EQ</u>	Gold Beach, OR	88.1 mhz	CSN Full Time Translator
<u>K201EA</u>	Grangeville, ID	88.1 mhz	CSN Full Time Translator
<u>K205DL</u>	Granite Falls/Everett,	88.9 mhz	CSN Full Time Translator
<u>K205CJ</u>	Prairie City, OR	88.9 mhz	CSN Partial Translator
<u>K213CF</u>	Grants Pass, OR	90.5 mhz	CSN Full Time Translator
<u>K249BS</u>	Grants Pass/Wolf	97.7 mhz	CSN Full Time Translator
<u>K258AL</u>	Groom Creek/Prescott,	99.5 mhz	CSN Full Time Translator
<u>K204DH</u>	Hanford, WA	88.7 mhz	CSN Full Time Translator
<u>K216EC</u>	Happy Camp, CA	91.1 mhz	CSN Full Time Translator
<u>K204DC</u>	Havilah/Bakersfield,	88.7 mhz	CSN Full Time Translator
<u>K217CN</u>	Holbrook, AZ	91.3 mhz	CSN Full Time Translator
<u>KGNR</u>	John Day, OR	91.9 mhz	CSN Partial FM Stations
<u>KBLD</u>	KENNEWICK, WA	91.7 mhz	CSN Full Time FM Stations
<u>K205DB</u>	Klamath Falls, OR	88.9 mhz	CSN Full Time Translator
<u>K202CF</u>	La Grande, OR	88.3 mhz	CSN Full Time Translator
<u>K207CT</u>	Lakehead, CA	89.3 mhz	CSN Full Time Translator
<u>K220II</u>	Lakeview, OR	91.9 mhz	CSN Full Time Translator
<u>K212EP</u>	Landers, CA	90.3 mhz	CSN Full Time Translator
<u>K215CS</u>	Langlois, OR	90.9 mhz	CSN Full Time Translator
<u>K213AR</u>	Las Cruces, CA	90.5 mhz	CSN Full Time Translator

<u>K216AX</u>	Laurel/Santa Cruz, CA	91.1 mhz	CSN Full Time Translator
<u>K211BW</u>	Laytonville, CA	90.1 mhz	CSN Full Time Translator
<u>K207DO</u>	Lewiston, ID	89.3 mhz	CSN Full Time Translator
<u>K216CO</u>	Lompoc, CA	91.1 mhz	CSN Full Time Translator
<u>K201FW</u>	Los Gatos, CA	88.1 mhz	CSN Full Time Translator
<u>K201FE</u>	Lovelock, NV	88.1 mhz	CSN Full Time Translator
<u>K220IA</u>	Maple Creek, CA	91.9 mhz	CSN Full Time Translator
<u>K214CT</u>	Mariposa, CA	90.7 mhz	CSN Full Time Translator
<u>K296BS</u>	Medford, OR	107.1 mhz	CSN Full Time Translator
<u>K220HH</u>	Mesa, AZ	91.9 mhz	CSN Full Time Translator
<u>K212DB</u>	Moses Lake, Wa	90.3 mhz	CSN Full Time Translator
<u>K206CU</u>	Mount Vernon, WA	89.1 mhz	CSN Full Time Translator
<u>K215CU</u>	Mt Shasta, CA	90.9 mhz	CSN Full Time Translator
<u>K208DO</u>	Napa, CA	89.5 mhz	CSN Full Time Translator
<u>K295AJ</u>	North Las Vegas, NV	106.9 mhz	CSN Full Time Translator
<u>K201EM</u>	Olympia, WA	88.1 mhz	CSN Full Time Translator
<u>K211DC</u>	Pahrump/Las Vegas, NV	90.1 mhz	CSN Full Time Translator
<u>K288BO</u>	Paso Robles, CA	105.5 mhz	CSN Full Time Translator
<u>K220GZ</u>	Payson, AZ	91.9 mhz	CSN Full Time
<u>K213CV</u>	Pine Grove, CA	90.5 mhz	CSN Full Time Translator
<u>K219CG</u>	Pinetop, AZ	91.7 mhz	CSN Full Time Translator
<u>K201EZ</u>	Port Angeles, WA	88.1 mhz	CSN Full Time Translator
<u>K244AY</u>	Project City, CA	92.1 mhz	CSN Full Time Translator

<u>K216FA</u>	Quartz Hill/Lancaster,	91.1 mhz	CSN Full Time Translator
<u>K203DE</u>	Redmond, OR	88.5 mhz	CSN Full Time Translator
<u>K292EX</u>	Reno, NV	106.3 mhz	CSN Full Time Translator
<u>K215CA</u>	Ridgecrest, CA	90.9 mhz	CSN Full Time Translator
<u>K214CM</u>	Roseburg, OR	90.7 mhz	CSN Full Time Translator
<u>K215DX</u>	Round Mountain, NV	90.9 mhz	CSN Full Time Translator
<u>K252CK</u>	Salinas, CA	98.3 mhz	CSN Full Time Translator
<u>K249AQ</u>	San Ardo & Bradley, CA	97.7 mhz	CSN Full Time Translator
<u>K201DF</u>	San Luis Obispo, CA	88.1 mhz	CSN Full Time Translator
<u>K285EW</u>	San Luis Obispo, CA	104.9 mhz	CSN Full Time Translator
<u>K212EY</u>	Sandpoint, ID	90.3 mhz	CSN Full Time Translator
<u>K218CP</u>	Santa Barbara, CA	91.5 mhz	CSN Full Time Translator
<u>K215CC</u>	Santa Maria, CA	90.9 mhz	CSN Full Time Translator
<u>K272CH</u>	Scotia, CA	102.3 mhz	CSN Full Time Translator
<u>K280BK</u>	Selma, OR	103.9 mhz	CSN Full Time Translator
<u>K205DH</u>	Shelton, WA	88.9 mhz	CSN Full Time Translator
<u>K208CZ</u>	Sonora, CA	89.5 mhz	CSN Full Time Translator
<u>K240CD</u>	Soquel, CA	95.9 mhz	CSN Full Time Translator
<u>K207CP</u>	South Lake Tahoe, NV	89.3 mhz	CSN Full Time Translator
<u>KKRS</u>	SPOKANE/DAVENPORT, WA	97.3 mhz	CSN-Full FM Stations
<u>K205EA</u>	Sprague River, OR	88.9 mhz	CSN Full Time Translator
<u>K201DR</u>	Sun Valley, NV	88.1 mhz	CSN Full Time Translator
<u>K206BK</u>	Susanville, CA	89.1 mhz	CSN Full Time Translator

<u>K201GC</u>	Talmage/Ukiah, CA	88.1 mhz	CSN Full Time Translator
<u>KRTM</u>	TEMECULA, CA	88.9 mhz	CSN Full Time FM Stations
<u>K220GO</u>	Tempe/Phoenix, AZ	91.9 mhz	CSN Full Time Translator
<u>K205EG</u>	The Dalles, OR	88.9 mhz	CSN Full Time Translator
<u>K207CH</u>	Twisp, WA	89.3 mhz	CSN Full Time Translator
<u>K212EK</u>	Victorville, CA	90.3 mhz	CSN Full Time Translator
<u>KTWD</u>	WALLACE, ID	97.5 mhz	CSN-Full FM Stations
<u>K203CZ</u>	Walton, OR	88.5 mhz	CSN Full Time Translator
<u>K207CS</u>	Wenatchee, WA	89.3 mhz	CSN Full Time Translator
<u>K212AP</u>	Willits, CA	90.3 mhz	CSN Full Time Translator
<u>K201FF</u>	Winnemucca, NV	88.1 mhz	CSN Full Time Translator
<u>K218CX</u>	Yakima, WA	91.5 mhz	CSN Full Time Translator
<u>K204DJ</u>	Yankee Hill, CA	88.7 mhz	CSN Full Time Translator
<u>K213CY</u>	Yankee Hill/Paradise,	90.5 mhz	CSN Full Time Translator
<u>K204DM</u>	Yreka, CA	88.7 mhz	CSN Full Time Translator
<u>K216CX</u>	Yucca Valley, CA	91.1 mhz	CSN Full Time Translator
<u>K211DD</u>	Yuma, AZ	90.1 mhz	CSN Full Time Translator

Enclosure 2

Letter to Facility Owners and Managers

Use Local Office Letterhead

Dear Facility Owner or Manager:

The Forest Service recently modified its fee waiver policy, as it pertains to nonprofit, educational sectarian broadcasters, to provide a full rental fee waiver for the use of National Forest System lands for communications purposes. Sectarian broadcasters, as defined in our fee waiver policy, include those television and radio stations whose programming promotes a particular belief, ideology, or cause. A fee waiver will be granted to sectarian broadcasters that can provide documentation of their classification by the Federal Communications Commission (FCC) as a noncommercial, educational broadcaster and of their nonprofit status under section 501(c)(3) of the Internal Revenue Code. These requirements have been met by the Calvary Satellite Network (CSN) radio and translator affiliates for billing year 2002.

Accordingly, if you are a CSN broadcaster and hold a Forest Service communications site lease or permit, the Forest Service will not include your use in the calculation of your rental fee for your communications site facility for 2002. Fee waivers for billing years 2003 and beyond will require annual documentation from you of your nonprofit status as defined in section 501(c)(3) of the Internal Revenue Code and of your classification by the FCC as a noncommercial, educational broadcaster.

If you are a non-CSN noncommercial, educational sectarian broadcaster and hold a Forest Service communications site lease or permit, the Forest Service will not include your use in the calculation of the 2002 rental fee for your facility if you provide the authorized officer by February 1, 2002, documentation of your nonprofit status under section 501(c)(3) of the Internal Revenue Code and of your classification by the FCC as a noncommercial, educational radio or television station. Fee waivers for billing years 2003 and beyond will require annual documentation from you of your nonprofit status as defined in section 501(c)(3) of the Internal Revenue Code and of your classification by the FCC as a noncommercial, educational broadcaster.

For all facility owners or managers, the Forest Service will not include in your rental fee calculation for 2002 CSN radio and translator entities that are sublessees in your facility **AND** that appear in your current certified facility inventory (provided to the authorized officer by October 15, 2001). Non-CSN noncommercial, educational sectarian broadcasters that are subleasees in your facility will not be included in the calculation of the 2002 rental fee for your facility if you provide the authorized officer by February 1, 2002, documentation of the non-CSN broadcasters' nonprofit status under section 501(c)(3) of the Internal Revenue Code and classification by the FCC as a noncommercial, educational radio or television station. Exclusion of noncommercial, educational sectarian broadcasters from your rental calculation for billing years 2003 and beyond will require annual documentation from you of their nonprofit status as defined in section 501(c)(3) of the Internal Revenue Code and classification by the FCC as a noncommercial, educational broadcaster.

If you have any questions, please feel free to contact XXXXXXXX XXXXXXXXXXXX at the XXXXXXXX Ranger District. He/ she may be reached at (xxx) xxx-xxxx.

Sincerely,

District Ranger

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NEWS

Federal Communications Commission
1919 - M Street, N.W.
Washington, D.C. 20554

News media information 202 / 418-0500
Fax-On-Demand 202 / 418-2830
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This is an unofficial announcement of Commission action. Release of the full text of a Commission order constitutes official action. See MCI v. FCC, 515 F 2d 385 (D.C. Circ 1974).

Report # MM 98-2

MASS MEDIA ACTION

February 25, 1998

FCC MODIFIES EEO ENFORCEMENT FOR RELIGIOUS BROADCASTERS

The FCC said that religious broadcasters may establish religious belief or affiliation as a job qualification for all station employees.

In a modification to the FCC's enforcement of its broadcast Equal Employment Opportunity (EEO) rules, the Commission said that it is reasonable to conclude that it is appropriate for all employees of religious broadcasters to share a common commitment to a licensee's basic religious objective and mission. The Commission's action facilitates religious broadcasters' ability to order their internal affairs and eliminates the potential for impermissible governmental interference in the conduct of religious affairs.

The Commission emphasized, however, that this action does not create a blanket exemption from the FCC EEO rule and does not permit religious broadcasters to engage in employment discrimination against women and minorities. When vacancies occur, religious broadcasters will still be required to recruit without limitation on the basis of race, color, national origin or gender from among those who share their religious affiliation or belief.

Previously, the FCC had a limited EEO enforcement exemption for religious broadcasters that only applied the exemption to vacancies involving persons hired to espouse religious views over the air. The Commission said that the new approach would end the need for the current practice of engaging in case-by-case analysis of particular job categories to determine if they involve espousal of the licensee's religious views. The Commission's action responds to concerns by religious broadcasters that its prior approach excessively entangled the government in the affairs of religious entities.

For these purposes, a "religious broadcaster" is defined as a licensee which is, or is closely affiliated with, a church, synagogue, or other religious entity, including a subsidiary of the religious entity. Specific determinations of whether a licensee is a "religious broadcaster" will be made on a case-by-case analysis.

Action by the Commission by Order and Policy Statement (FCC 98-19). Chairman Kennard, Commissioners Ness, Furchtgott-Roth, Powell and Tristani, with Commissioner Furchtgott-Roth issuing a separate statement.

News Media Contact: David Fiske (202) 418-0513

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February 25, 1998

SEPARATE STATEMENT OF COMM. HAROLD W. FURCHTGOTT-ROTH**In the Matter of Broadcast Equal Employment Opportunity Enforcement Policy As to Religious Broadcasters**

I agree with the essential conclusion of this Order & Policy Statement, namely, that religious broadcasters should be permitted to establish religious belief or affiliation as a legitimate occupational qualification for all employees, and I therefore support its adoption. I write separately simply to highlight several important points that this item leaves unaddressed.

Who Is A "Religious Broadcaster"?

At this point in time, it is not entirely clear which broadcast licensees are even entitled to invoke the benefits of this Order & Policy Statement. If the meaning of the term "religious broadcaster" truly depends on "case-by-case analysis, based upon an evaluation of . . . characteristics" not conclusively described, *see* page 4 ("relevant characteristics will include, *among other things* . . .") (emphasis added), it would appear difficult, if not impossible, to know *ex ante* whether a particular licensee is covered by the policy -- at least until the Commission establishes helpful precedent on the definition of "religious broadcaster." And although we observe that the Equal Employment Opportunity Commission conducts a "similar" inquiry, *id.*, we do not say whether the existing caselaw developed by that agency will in fact guide our decisionmaking.

Due to this potential ambiguity as to coverage, I fear that we may have merely shifted the uncertainty and attendant chilling effect surrounding the rights of religious broadcasters from the back end of our policy (the determination of jobs involving religious espousal) to the front (the determination whether a licensee is a religious broadcaster). *Cf. Corporation of the Presiding Bishop v. Amos*, 483 U.S. 327, 343-44 (1987) (Brennan, J., concurring) ("A case-by-case analysis for [religious and secular] activities . . . would both produce excessive government entanglement with religion and create the danger of chilling religious activity."). This remains to be seen.

Potential Inconsistency Between Exemption and Processing Scheme

In the near future, perhaps when we apply this new rule in the context of a specific licensing proceeding, I would hope that we also come to grips with other practical problems that implementation of the item could present. For instance, although the Order & Policy Statement asserts that religious broadcasters cannot discriminate on the basis of race, color, national origin, or gender "from among those who share their religious affiliation or belief," page 4, our current Equal Employment Opportunity (EEO) processing scheme explicitly requires statistical comparison of the racial and gender composition of a broadcaster's workforce to the general racial and gender makeup of the entire local labor market, without regard to religious affiliation. *See Streamlining Broadcast EEO Rules and Policies* (Order and Notice of Proposed Rulemaking), 11 FCC Rcd 5154, 5159-61 (1996).

If the ability to choose employees who share a religious broadcaster's faith is to be exercised without penalty for any unintentional disparate impact that such exercise might have on other groups, *cf. In re Applications of the Lutheran Church/Missouri Synod* (Memorandum Opinion and Order), 12 FCC Rcd 2152, 2153 (1997), the Commission should evaluate that broadcaster's equal employment efforts in light of the labor pool of persons with the same religious affiliation as the broadcaster. Procedural adjustments thus may be necessary in order to eliminate this potential inconsistency between our new approach toward religious broadcasters and extant EEO procedures.

Processing By Legal Standards Rather Than "Guidelines"

The above-described modification of our renewal procedures should be clearly established in a legally enforceable manner. Unfortunately, the Commission's current processing "guidelines," as they have been termed, are not set forth in any duly-promulgated regulations. Rather, they are merely the product of agency custom -- a situation that can all too easily lead to inconsistent and possibly arbitrary application -- and were apparently developed without notice or comment.

Although we thus would be well advised to codify the entirety of our enforcement guidelines in published and accessible rules so that *all* broadcasters could enjoy greater certainty about the standards by which their EEO efforts will be measured, only the question of religious broadcasters is posed here. And with respect to those broadcasters, we ought at least to ensure that if the above-described adjustment to our EEO review is made, it is rooted in a rule of law.

Legal Status of Changes in EEO Enforcement

To all of this, there is a complicating factor: section 334 of the Communications Act. That provision states:

"[T]he Commission shall not revise . . . the regulations concerning equal employment opportunity as in effect on September 1, 1992 (47 C.F.R. 73.2080) as such regulations apply to television broadcast station licensees and permittees; or . . . the forms used by such licensees and permittees to report pertinent employment data to the Commission."

47 U.S.C. section 334(a)(1)-(2). In light of section 334, the Commission noted at the outset of this proceeding that any changes in our EEO system that "require the revision of EEO regulations and/or forms for television stations would require statutory change" and further observed "that statutory change would not be required for the proposals if they only applied to radio stations." *Streamlining Broadcast EEO Rules and Policies*, 11 F.C.C. Rcd. at 5167. By its plain terms and as the Commission has construed it, then, section 334 has no applicability to regulatory changes made with respect to radio stations.⁽¹⁾ Religious broadcasters who operate those kinds of stations can thus be sure that they are legally entitled to use religious affiliation as a *bona fide* occupational qualification for all station jobs upon issuance of this item.⁽²⁾

Whether religious broadcasters in the television business can do so, however, is far murkier. We have made clear that, due to section 334, this item is only a statement of policy as to religious television stations. *See* pages 2-3 ("This action should be considered . . . [,] in light of the limitations imposed by Section 334 of the Communications Act, a non-binding policy statement for television licensees and permittees."). Policy statements, as the U.S. Court of Appeals for the D.C. Circuit has repeatedly explained, have no force of law whatsoever, absent independent rulemaking or adjudication. *See Telecommunications Research and Action Center v. FCC*, 800 F.2d 1181, 1186 (1986) (policy statement is "neither a rule nor a precedent. . . . [L]ike a press release, [it] presages an upcoming rulemaking or announces the course which the agency intends to follow in future adjudications.") (quoting *Pacific Gas & Electric Co. v. FPC*, 506 F.2d 33, 38 (D.C. Cir. 1974)); *American Bus Association v. ICC*, 627 F.2d 525, 529 (D.C. Cir. 1980) (policy statement "acts [only] prospectively" and "genuinely leaves the agency and its decision-makers free to exercise discretion.").

Accordingly, today's action cannot, by itself, create any enforceable substantive right in religious television broadcasters to be free from application of the EEO religious anti-discrimination provision, nor can it preclude the Commission from enforcing that provision against such broadcasters. Until we either embody the "policy" announced today in an official agency rule or adhere to it in future adjudication, the legitimate interests of all religious broadcasters that we recognize today will not be safeguarded with any degree of real certainty. Short of such action, this statement is but a promise that can be broken tomorrow.

On the other hand, further agency action to create a binding standard for religious television broadcasters might

arguably run afoul of section 334. That is, subsequent adherence to this policy statement by the Commission in matters involving television licensees could theoretically raise questions about the propriety of such action *if* application of the policy could be said to constitute a "revision of EEO regulations" within the meaning of section 334. And if that *were* the case, Congressional action might be necessary, as suggested in the Notice of Proposed Rulemaking, and our hands might be tied; no matter how laudable the goal of establishing an enforceable right for religious television broadcasters to hire based on religious affiliation, the Commission of course would not be free to violate the law in pursuit of that end. While I express no final views on the impact of section 334 on our ability to take action beyond mere policy statements in this context, I simply note the possibility that we could find ourselves on the horns of a regulatory dilemma as far as religious broadcasters who operate television, as opposed to radio, stations are concerned.

Religious Freedom

I note one last, and grave, difficulty with respect to enforcement of the EEO rules as against religious broadcasters. If and when an individual claims that they are a member of a certain religious faith but were nevertheless denied a job based on impermissible factors, and the religious broadcaster in turn asserts that the person is not in fact a member of their religious group, it is imperative that the Commission not involve itself in the determination of who is and who is not a *bona fide* member of a particular religious organization. Even under the umbrella of one religious denomination, there may be factions that disagree about the tenets of that denominational faith; the history of religion is replete with examples of such schisms. These are intensely personal debates into which government ought not inject itself. If the factual question of who is a "true" member of a particular religious group arises in the context of an EEO proceeding, government should defer to the considered judgment of the particular group with which the broadcaster is affiliated.

Indeed, the constitutional principles implicitly acknowledged today teach as much. The First Amendment protects the ability of religious entities "to decide for themselves, free from state interference, matters of church government as well as those of faith and doctrine," *Kedroff v. St. Nicholas Cathedral of the Russian Orthodox Church in North America*, 344 U.S. 94, 116 (1952), and "[t]here can be no clearer example of an intrusion into the internal structure or affairs of an association than a regulation that forces the group to accept members it does not desire," *Roberts v. United States Jaycees*, 468 U.S. 609, 623 (1984). In implementing our EEO rules, we must take care not to infringe the rights of religious organizations to self-identification, or the associational rights of persons belonging to such organizations, by launching governmental inquiries into whether a person shares the same faith as others who believe that he does not.

Conclusion: A Step In The Right Direction

Notwithstanding the above-described concerns regarding future implementation of this new EEO position, I support this item. I do so because I believe that it is a step in the legally right direction for our EEO policies concerning religious broadcasters. By no means, however, does it represent the end of the matter. Many difficult issues -- including ones deriving from the non-binding nature of this action with respect to television licensees -- lie ahead.

1. For this reason, the suggestions that I make above such as codification of our processing guidelines, if limited to radio stations, would not seem barred by section 334. As for my proposals as applied to television stations, legislative action may be required under that statute, as explained below.

2. Or, more accurately, they can be sure of their ability to do so 30 days after publication of this item in the Federal Register or upon receipt by Congress of a report under the Contract with America Advancement Act, whichever is sooner. See page 6.

FEMA



Stanley W. Carlson-Thies

12/18/2001 09:46:13 AM



Record Type: Record

To: Don R. Willett/WHO/EOP@EOP

cc:

Subject: Denial of Aid by FEMA to Seattle Hebrew Academy

you can see others are in the loop; don't know if what is critical is OMB, DOJ, or OFBCI intervention . . .

----- Forwarded by Stanley W. Carlson-Thies/WHO/EOP on 12/18/2001 09:45 AM -----



David Kuo

12/17/2001 06:01:44 PM

Record Type: Record

To: Stanley W. Carlson-Thies/WHO/EOP@EOP, carl.esbeck@usdoj.gov @ inet

cc: John M. Bridgeland/OPD/EOP@EOP

Subject: Denial of Aid by FEMA to Seattle Hebrew Academy

interesting -- thoughts on how to help?

----- Forwarded by David Kuo/WHO/EOP on 12/17/2001 06:01 PM -----



Nathan Diament <ndiament@ou.org>

12/17/2001 01:45:18 PM

Please respond to ndiament@ou.org

Record Type: Record

To: Jay P. Lefkowitz/OMB/EOP@EOP, David Kuo/WHO/EOP@EOP

cc:

Subject: Denial of Aid by FEMA to Seattle Hebrew Academy



- SHA ltr.doc

December 17, 2001

Mr. Jay Lefkowitz, Esq.
General Counsel
Office of Management & Budget
The White House

Mr. David Kuo
Office of Faith-Based &
Community Initiatives
The White House

By Electronic Mail & Facsimile

Dear Jay and David,

I hope this letter finds you well. I am writing to bring to present to you an important matter that has recently been brought to my attention. It is the denial of federal disaster aid to the Seattle Hebrew Academy ("SHA") by the Federal Emergency Management Agency ("FEMA").

Briefly, the SHA is a private non-profit educational institution that suffered extensive structural damage in the Nisqually Earthquake of February 28, 2001. SHA applied to the Small Business Administration and FEMA for relief. The SBA rejected SHA's loan application because of its likely inability to repay the debt. FEMA deemed the SHA to be ineligible for its public assistance program, a position FEMA has maintained over the objections of the Washington State Emergency Management Division and that state's congressional delegation. The regional office of FEMA has rejected the SHA's initial appeal of its decision; SHA's second appeal will be filed this month.

FEMA's denial of aid to the Seattle Hebrew Academy is primarily based upon 42 C.F.R. §206.221(e)(1) that excludes facilities used "used primarily for religious purposes" from disaster aid eligibility. Despite submissions from the SHA demonstrating, consistent with other relevant regulations, that the 50% of the use of SHA facilities are for "eligible activities," and that the facility is of utility to the general public, FEMA continues to deny aid to the SHA.

The damages sustained by the SHA are significant and public aid is essential for it to continue to be a viable institution for Seattle's Jewish community. Familiar as I am with the commitment President Bush has made to make the federal government more sensitive to and caring of America's faith-based and community institutions, I must believe that this matter is either a misapplication of the relevant regulations by overly cautious administrators, or reveals to us a regulatory rubric that must be reformed.

I will transmit to you by facsimile the materials provided to me by the Seattle Hebrew Academy's attorneys that more completely set forth the facts and legal provisions involved with this matter. I look forward to discussing it with you.

Best wishes,

Nathan Diament



Stanley W. Carlson-Thies

12/18/2001 09:46:25 AM



Record Type: Record

To: Don R. Willett/WHO/EOP@EOP

cc:

Subject: My Earlier Letter re: Seattle Heb. Acad. & FEMA`

----- Forwarded by Stanley W. Carlson-Thies/WHO/EOP on 12/18/2001 09:46 AM -----



David Kuo

12/17/2001 06:02:07 PM

Record Type: Record

To: Stanley W. Carlson-Thies/WHO/EOP@EOP, carl.esbeck@usdoj.gov @ inet

cc:

Subject: My Earlier Letter re: Seattle Heb. Acad. & FEMA`

----- Forwarded by David Kuo/WHO/EOP on 12/17/2001 06:01 PM -----



Nathan Diament <ndiament@ou.org>

12/17/2001 05:00:45 PM

Please respond to ndiament@ou.org

Record Type: Record

To: Jay P. Lefkowitz/OMB/EOP@EOP

cc: David Kuo/WHO/EOP@EOP

Subject: My Earlier Letter re: Seattle Heb. Acad. & FEMA`

Jay,

Just a point of clarification (based upon a further conversation with SHA's attorneys):

While, as stated in my letter, FEMA's initial denial of aid to the SHA was on the basis that they are a facility "primarily used" for religious purposes, FEMA clarified during the first appeal that it accepts the assertion that SHA is 50% used for "eligible purposes."

Now, the denial of aid is based upon FEMA's finding that SHA is not "open to the general public" because, despite its non-discrimination

policy, all of its students are, understandably, Jewish.

This is all contained in the materials I faxed to you -- especially the Latham & Watkins and Louis Treiger memoranda. These attorneys are, obviously, more intimately familiar with the details of this case, I am just a facilitator. Mr. Treiger also informs me that Lloyd Blanchard, OMB Associate Director of General Govt. Programs is familiar, to some degree, with this dispute.

Thanks again for taking the time to look into this.

Sincerely,

Nathan

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FORM	SUBJECT/TITLE	PAGES	DATE	RESTRICTION(S)
Email	Centers - To: Don R. Willett - From: Roberta Shea	1	10/10/2001	P5;

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FOLDER TITLE:

[Correspondence] [Folder 3] [2]

FRC ID:

814-

OA Num.:

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NARA Num.:

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RESTRICTION CODES

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- P1 National Security Classified Information [(a)(1) of the PRA]
- P2 Relating to the appointment to Federal office [(a)(2) of the PRA]
- P3 Release would violate a Federal statute [(a)(3) of the PRA]
- P4 Release would disclose trade secrets or confidential commercial or financial information [(a)(4) of the PRA]
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- b(8) Release would disclose information concerning the regulation of financial institutions [(b)(8) of the FOIA]
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List	OFBCI Brainstorming	3	10/05/2001	P5;

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List	OFBCI - 2001 and Beyond	1	N.D.	P5;

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Q & A	The Administration's budget proposes that the BOP will operate four multi-faith based rehabilitation programs.	1	N.D.	P5;

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Notes	Vol./Ind. Action Working Group	1	11/27/2001	P5;

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Postal Service Might Begin Marking Mail (USA)

By Richard Willing

USA Today, November 06, 2001

WASHINGTON - The U.S. Postal Service might begin marking letters and packages to try to reassure Americans that their mail has been inspected for anthrax and cleared for delivery, a spokesman said Monday. "We're working with (our) marketing people and consumer advocates to see if there's a way we could let people know that mail has been sanitized," says Azeezaly Jaffer, the Postal Service's vice president for communications. The plan to address concern over mail safety came as the Postal Service prepared to begin sorting and delivering the first batch of letters and packages that were impounded at Washington's giant Brentwood mail-sorting facility after anthrax was discovered there Oct 15.

Since then, Brentwood has been closed for decontamination, and the approximately 3.5 million pieces of mail it handles each day have been sent to other distribution centers. Those include the Postal Service's plant in Lima, Ohio, where mail sent to D.C. residents and the U.S. government is being treated with bacteria-killing radiation.

Mail intended for U.S. government addresses usually is routed through the Brentwood facility. A letter containing powdered anthrax that was sent to Senate Majority Leader Tom Daschle last month is believed to have been processed there.

Two Brentwood workers contracted inhalation anthrax and died. They are among the 4 people who have been killed in the anthrax attacks on government and media offices in Florida, Washington and New York. Fourteen others have been infected.

The Postal Service also said that traces of anthrax were found in two postal boxes in a post office in the Pentagon in nearby Arlington, Va. One box was rented by an unidentified member of the Navy and the other was unassigned, the Defense Department says.

Like thousands of mail handlers along the East Coast, all six employees of the Pentagon's post office already had been taking antibiotics, Jaffer says. As is the case with several other anthrax incidents, it's unclear whether the contamination at the Pentagon was caused by a powder-filled letter mailed there, or by mail that was contaminated elsewhere before arriving at the military headquarters. The Pentagon was struck Sept. 11 by a jet hijacked by terrorists; 189 people died.

Meanwhile, a USA TODAY/CNN/Gallup Poll released Monday indicates that only about one-third of Americans fear that they or their family members will be exposed to anthrax through the mail. Eighty percent say they are very or somewhat confident in the U.S. government's ability to respond to the anthrax crisis, up slightly from a poll Oct. 19-21.

"Of course I'm concerned, but at some point you've just got to say, 'I'm not going to let this control me,'" says Genevieve Sandoval, 20, a college student in Norwalk, Calif.

But Gary Fine, who studies how rumors shape public opinion, says that the public's ability to shrug off the scares could change quickly. "Right now, you have only a small number who have taken ill and died and it doesn't feel random," says Fine, a professor of sociology at Northwestern University in Evanston, Ill. "Next week could be something entirely different."

Also Monday:

- Authorities are exploring whether Kathy Nguyen, the Bronx, N.Y., woman who died Wednesday of inhalation anthrax, worked in a restaurant and might have come in contact with the deadly bacteria there. Her death has baffled authorities because it's unclear where she could have been infected.

Contributing: Kevin McCoy in New York

A New Start For National Service (NYTimes)

By JOHN McCAIN and EVAN BAYH

The New York Times, November 06, 2001

WASHINGTON -- Since Sept. 11, Americans have found a new spirit of national unity and purpose. Forty years ago, at the height of the cold war, President John F. Kennedy challenged Americans to enter into public service. Today, confronted with a challenge no less daunting than the cold war, Americans again are eager for ways to serve at home and abroad. Government should make it easier for them to do so.

That is why we are introducing legislation to revamp national service programs and dramatically expand opportunities for public service.

Many tasks lie ahead, both new and old. On the home front, there are new security and civil defense requirements, like increased police and border patrol needs. We will charge the Corporation for National Service, the federal office that oversees national volunteer programs, with the task of assembling a plan that would put civilians to work to assist the Office of Homeland Security. The military will need new recruits to confront the challenges abroad, so our bill will also improve benefits for our servicemembers.

At the same time, because the society we defend needs increased services, from promoting literacy to caring for the elderly, we expand AmeriCorps and senior service programs to enlarge our national army of volunteers.

AmeriCorps' achievements have been impressive: thousands of homes have been built, hundreds of thousands of seniors given the care they need to live independently and millions of children tutored.

Since its inception in 1993, nearly 250,000 Americans have served stints of one or two years in AmeriCorps. But for all its concrete achievements, AmeriCorps has been too small to rouse the nation's imagination. Under our bill, 250,000 volunteers each year would be able to answer the call - with half of them assisting in civil defense needs and half continuing the good work of AmeriCorps.

We must also ask our nation's colleges to promote service more aggressively. Currently, many colleges devote only a small fraction of federal work-study funds to community service, while the majority of federal resources are used to fill low-skill positions. This was not Congress's vision when it passed the Higher Education Act of 1965. Under our bill, universities will be required to promote student involvement in community activities more vigorously.

And for those who might consider serving their country in the armed forces, the benefits must keep pace with the times. While the volunteer military has been successful, our armed forces continue to suffer from significant recruitment challenges.

Our legislation encourages more young Americans to serve in the military by allowing the Defense Department to create a new, shorter-term enlistment option. This "18-18-18" plan would offer an \$18,000 bonus - in addition to regular pay - for 18 months of active duty and 18 months of reserve duty. And we would significantly improve education payments made to service members under current law.

Public service is a virtue, and national service should one day be a rite of passage for young Americans. This is the right moment to issue a new call to service and give a new generation a way to claim the rewards and responsibilities of active citizenship.

John McCain, Republican of Arizona, and Evan Bayh, Democrat of Indiana, are United States senators.

How to Insure Terror (WPost)

The Washington Post - Opinion; Tuesday, November 6, 2001; Page A22

THE TERRORIST attacks have hit the airline network and the postal network, two arteries of the economy. But they have also hit insurance, another industry that underpins the orderly working of business. In order to attract capital, companies have to convince investors that their money won't be suddenly wiped out, so they insure their buildings and property against fire, earthquakes and other catastrophes. But next January, when many existing policies expire, companies may find terrorism coverage impossible to buy. The administration and Congress are rightly working to head off that danger. But their ideas are unconvincing.

The administration and some leading senators want the government to pick up most of the cost of future terrorist attacks after the industry pays the first \$10 billion. Property/casualty insurers have reserves of more than \$300 billion, so even after paying out \$30 billion-plus for Sept. 11, they have enough to sustain a further hit of \$10 billion. Of course, individual insurers have much smaller reserves, so a terrorist attack on property covered entirely by one or two firms might cause bankruptcies. But insurers are expert at parceling out risks among themselves. Commercial skyscrapers are covered by syndicates of firms, so that none is liable for more than a fraction of the value.

Thus far the administration-Senate plan looks good. But it has two weaknesses. First, the government is relieving the insurance industry of a large amount of risk without charging anything for this service; it ought to collect premiums from the industry, much as a private reinsurer would do. The rival House plan includes a mechanism for compensating taxpayers for the new risk, and is in this respect superior. The insurance industry itself proposed a scheme involving payments to the government. Why would government refuse this offer?

Second, the administration-Senate plan may underestimate the problems that flow from the unpredictability of terrorism. Nobody knows whether the chance of an attack on a landmark building over the next year is one in a thousand or one in a billion. Faced with this uncertainty, insurers may stop offering terrorism coverage even if the government is picking up a large percentage of the claims. The Senate plan addresses this issue by obliging property/casualty insurers to include terrorism coverage in their policies. But that might make insurers withdraw property coverage altogether from high-risk sites, or price it unaffordably.

The administration says that time is running out, and that imperfect legislation is better than nothing. This is true, and it may be that the government comes up with a plan that gets insurers to cover most property in the country; the landmark sites considered too risky to touch would then be covered directly by the government. But this is not an elegant solution. It would be better to set up a government-backed terrorism pool into which all insurers would pay, thus spreading the risk of future attacks

David S. Broder

A Crisis In Public Service

Whatever their views before Sept. 11, Americans of all stripes have relearned the lesson that when there is a crisis, it's handy to have a government that can cope. Not just the heroic firefighters, police and rescue workers but bureaucrats in the Pentagon and State Department and scientists at the Centers for Disease Control and Prevention have won acclaim. Trust in government is at a 35-year high.

How long this will last, no one can say. But a variety of people, both in the private sector and in public office, have decided that this is the moment to launch an effort to repair and improve the federal bureaucracy—an institution they say is in crisis.

Last week President Bush took time from his work as commander in chief to address an awards ceremony for outstanding senior civil servants and to set forth an initiative to make work more rewarding for those already in government and more attractive to the thousands of talented people Uncle Sam will have to recruit in the years just ahead. While reiterating his opposition to expanded government, he described federal employment as "a noble calling and a public trust," and vowed to make federal jobs "more challenging, more satisfying and more fulfilling."

This week (Tuesday) will see the formal roll-out of the Partnership for Public Service, a new nonprofit dedicated to attracting talented people—both recent graduates and those in midcareer—to government and improving the bureaucratic environment. The partnership is funded with a \$25 million gift from Samuel Heyman, who worked for Attorney General Robert Kennedy 40 years ago and made his fortune as a Connecticut businessman.

Next week, also, two Republican legislators, Sen. George Voinovich of Ohio and Rep. Constance Morella of Maryland, will introduce legislation designed to make it easier to hire and retain high-quality employees and to emulate the modern management techniques that have made America's outstanding private companies good places to work. Their legislation is strikingly similar in purpose and in detail to the "freedom to manage" proposals unveiled by the Bush administration at the ceremony where the president spoke.

Diana Abu-Jaber

Seeing Ourselves

Ten days after the terrorist attacks, I was on campus preparing for the start of school when the clean-cut young man approached and handed me a flier. He looked me in the eye and nodded as if we'd conducted a business transaction. And then I looked at the flier; it called for, among other things, "a rounding up and questioning of all Arabs." My first thought was to tell him he'd confused me with someone else. He hadn't realized I was one of the ones he wanted rounded up. But after I climbed the four flights of stairs to my office, I found the same flier slipped under my office door—the same door that bears my very Arabic name. For some time, all I could do was stare out my office window at the tiny sliver of sky that shows through the skylight. I remembered that when we lived in Jordan and I was a little girl, there was a woman who used to take care of me who was from a place called Palestine. She used to say: In times of great calamity, clear your eyes and make your mind like a pond of water.

Years later, I read nearly verbatim the same words of advice in a novel by an American writer. It was like coming across a juncture of insight without culture, a moment of mutuality and recognition. I grew up with people always telling me who I was, based on such clues as the color of my skin or the sound of my name, but I often had the sense that they weren't really looking.

Even now, I'm frequently told—sometimes insistently—that I don't look Arab. I'm told that I look Russian or French or Irish or Greek or Italian. I don't take it too personally, though I sometimes have the sense that people simply don't want me to look Arab. Just the other day, while discussing the frightening fallout of the attacks, a good friend asked, "You don't think of yourself as Arab, do you? I don't!"

But sometimes things aren't so clear. Even though I've spent most of my life in America, five years ago I was again living in Jordan. An American friend and I were driving through the open countryside and at one point we decided to explore the courtyard of one of the crumbling medieval castles scattered around Jordan. The place appeared to be utterly abandoned and desolate; there was a large rusted padlock on the door. The wind came ringing high over the desert plain, and for miles around the only movement seemed to come from a pack of yellow dogs trotting toward us from the far horizon. Their eyes were soft and their mouths hung open in natural smiles. But then we realized that a man was walking with them and this man had a powerful, rigid face, the aspect of someone who's spent his nights watching the stars and animals, who hadn't learned how to govern his internal state in order to please or comfort other humans.

He approached us with his pack of dogs and the closer he got the more thunderstruck his expression. He finally stopped, raised one hand and pointed at me. My pulse was leaping in my throat. Wind roaring in our ears, both my friend and I stood stock still, unsure if we were intruding. But then his expression seemed to break open and he quietly said, "Anissa?" My grandmother was named Anissa, but she had been dead for more than 30 years. We then learned this man had known her when she was a young woman living in Amman. No one in my family has ever told me I resembled my grandmother—a woman who died before I was born. But here, years later, and miles away from Amman, this stranger crossed an empty space, squinted through sand and wind, and recognized something.

It's a rare and lovely experience to feel as if someone really has seen you, and it's become more essential than ever for us to try to do just that. We mustn't allow the rage, hatred and terror churned up in the wake of the horrific attacks to tear at our fabric as a people—as members of a nation or members of the world. Film and television, among other media, have caused viewers to see Arabs, as well as African Americans and Native Americans, in a way that is often dehumanizing. It's time to see them as individuals, not as stereotypes.



REUTERS

Preservation Copy

Jim Hoagland

Our Underu

Left on its own, history ambles. But some events spur it to a furious gallop. The force of Sept. 11 as a great accelerator shows now in Europe, where the nature and shape of alliance are changing at warp speed.

Unthinkable yesterday becomes commonplace today. A German chancellor, normally hamstrung by public opinion and an antiwar constitution, sprang forward to offer military help for the U.S. campaign in Central Asia. France, ever mindful of its large Muslim minority and traditional pro-Arab policy, nonetheless immediately opened its air space to American warplanes and offered to send up to 30 of its own jets for the assault on Afghanistan.

A second round of expansion to extend NATO into the Baltic states has moved from bitter controversy to broad consensus in an eye's blink. Estonia, Latvia and Lithuania can now bank on receiving invitations late next year to join NATO, diplomats agree. So can a still-undetermined number of other Central and Eastern European states.

When they clamber aboard a few years later, the new members will find a significantly changed transatlantic alliance. America's war on global terrorism and Russia's decision to swallow NATO's Baltic advance, which will put it onto the territory of the former Soviet Union, will make the alliance a more openly political body than it is today.

"The old Cold War dog responded almost instantaneously" to the terrorist assault, George Robertson, secretary general of NATO, said with justified pride on his recent Washington visit. But, he added, "that old dog is a very

David Ignatius

Will War Er

The famous comment by John Maynard Keynes that economists should stop worrying so much about the long run because "in the long run we are all dead" doesn't seem quite so funny these days.

But when we think about the economic effects of Sept. 11, it's important to distinguish between the short-term effects—which have been devastating—and the longer-term consequences, which may be quite different.

president spoke.

This emphasis on the quality of the federal work force is timely, and not just because of the appreciation for public service that so many Americans have developed in the wake of the terrorist attacks. Dramatic action is necessary now to improve the conditions for government workers to prevent a mass exodus that could cripple agencies' ability to function.

As Max Stier, the partnership president (who has worked in all three branches of the federal government), points out, in the next three years more than half of federal workers will be eligible for retirement; more than seven out of 10 top government managers can claim their pensions by 2004.

In some agencies, the demographic gap is even more dramatic. Voinovich told me that the Nuclear Regulatory Commission—responsible for the safety of atomic energy—has six times more people over 60 on its payroll than under 30. "That is not unusual," he said, "and it explains why Jim Schlesinger [the former secretary of defense] says we are facing an unprecedented crisis" in staffing government.

There is broad agreement on many of the steps needed to make government work better: Increase the earning potential of specialists and top managers; make it easier for agencies to bring in both young talent and proven midlevel executives; make personnel issues a higher priority within the agencies.

But beyond those rather mechanical changes, much will depend on the kind of message and encouragement career people receive from their political bosses. One Bush Cabinet member who clearly understands this is Treasury Secretary Paul O'Neill.

In a recent appearance before the Council for Excellence in Government, another nonprofit working to improve the quality of the bureaucracy, O'Neill, a onetime White House deputy budget director who went on to run International Paper and Alcoa, talked about the difference between leading an organization and simply managing it.

"Leadership," he said, "is really about creating the conditions where people are comfortable with change and they know that they have an opportunity to make a contribution . . . and they're not in the business of taking orders."

A great organization, in O'Neill's terms, is one where everyone "is treated with dignity and respect . . . is given the tools and assistance needed to make a contribution that gives meaning to life" and receives recognition and thanks for making that contribution.

When all government agencies are like that, the crisis in public service will be over.

members of the world. Film and television, among other media, have caused viewers to regard Arabs, as well as African Americans and Native Americans—indeed anyone with dark skin or non-Christian beliefs—as suspicious, dangerous and even evil. In the wake of terrorism it's natural to feel frightened, angry and disoriented. But to honor our dead and to strengthen our living, we must draw together, recognizing our mutual humanity. We must be at peace—at the very least—with ourselves as a nation if we ever want to live in peace with the world.

Today when I enter the little family recreation center at the foot of the hill where I live in the suburbs of Portland, Ore., I overhear one of the mothers bantering with the front desk, saying, "I just wish they would round up all the people with Mohammed and Abu in their names and take them away." She looks up at me; she doesn't know why I'm staring at her. She doesn't know who I am and I do not recognize her. Every day since the terrorist attacks, I've heard comments like these—a chilling, blind rage that wills people into being Other. How desperately we want a simple world, a place in which some people are innately good and others are innately evil—how desperately we want to believe that this basic dichotomy will explain why those others do things like hate Americans and attack them. But this is a child's wish for a make-believe world.

The woman who took care of me when I was a child once told me the story of the Tower of Babel. Its creators were punished because they stopped listening to each other. The tower was a monolith, a prideful, fixed eye that stared only at heaven and tried to forget about the earth.

This is a strange and painful time to be Middle Eastern and American—a time when some people are buying American flags because they're frightened not to fly them. My Aunt J., who also lives in a place called Palestine, once told me: Catastrophes can bring out the very best and the very worst in people. Some people become better than they naturally are and some become much worse. That is why you must not judge ahead of time or expect too much in either direction.

Remembering this makes me hope that there's an opportunity for us to be better: to feel more deeply, to see each other and ourselves more clearly. If only we will look.

Diana Abu-Jaber is a professor of writing and the author of the novel "Arabian Jazz."

George F. Will

The Greening of New

NEW YORK—Mark Green's long shinny up the greasy pole of city politics will almost certainly be crowned with success when he is elected mayor Nov. 6. He has a difficult act to follow.

However, he may find governing after Rudy Giuliani made easier, in a sense, by the task of galvanizing the city's recovery from the trauma of terrorism. The encompassing nature of that challenge will force him to temper his liberalism. Furthermore, the sheer silliness of his opponent, who is crudely playing the race card, should emancipate Green from the sort of solicitous feelings that liberal mayors feel toward race hustlers, like Al Sharpton, who are parasitic off liberal guilt.

Green's "Republican" opponent is Michael Bloomberg, a liberal Democrat who, perhaps bored with piling up billions from his financial information media empire, decided to take up politics as a hobby by purchasing the mayoralty. To avoid a crowded Democratic primary, Bloomberg, no martyr to the ethic that parties should stand for something, baptized himself a Republican and spent \$20 million—more than \$400 for each of the 48,055 votes he received—winning the nomination at the disposal of the city's wee Republican Party.

The hobbyist could not be Sept. 11 would make government a very serious matter. Bloomberg, a brilliant "manager," and I believe, as Saint-Simon did, that things can be reduced to the a things. He has been reduced to whose liberal credentials are a cable, of racist campaigning.

Green supposedly sinned by competence of his opponent in runoff, Bronx Borough President Ferrer, whose response to the top Trade Center was to suggest a financial services industry to play the Bronx. Green is also being bamous fliers and phone calls wally—that Ferrer is close to S incorrigibly liberal, calls these cable," but he probably owes Sharpton's embrace of Ferrer. (Green on Friday.)

A prominent black Ferrer s like many liberals in a time wa campaign made her think she w Mississippi. She should be so lucky more black elected officials than

David S. Broder

A Service To the Country

The great feat of statesmanship is to turn catastrophe into opportunity. That is what John McCain and Evan Bayh hope to do, by converting the surge of patriotic energy unleashed by the terrorist attacks of last month into a greatly expanded program of national service for young Americans.

McCain, the Arizona Republican, and Bayh, the Indiana Democrat, are putting the finishing touches on legislation they will introduce in the Senate to encourage as many as 1 million youths every four years to spend a period of time working on projects that will benefit the country.

Their effort was under way before the events of Sept. 11, but, as McCain told me the other day, "That attack inspired patriotism and also identified many more ways in which people can serve."

Homeland defense—the new top priority for President Bush and the military establishment—is labor-intensive work. The armed forces will have their hands full hunting down the terrorist cells overseas. But there are myriad tasks here at home that can be done by well-trained volunteers: safeguarding the transportation and communications systems, assisting in monitoring the flow of people and goods across U.S. borders and providing security at large public gatherings of all kinds.

And there is the vital work of helping shattered families rebuild their lives and achieve at least some of the dreams they held before the terrorist attacks.

Some or all of these jobs might be assigned to the expanded AmeriCorps that Bayh and McCain are proposing. But much of the volunteer work, as they see it, would continue to focus on community projects, where AmeriCorps members have made themselves a vital catalyst for nonprofit organizations tackling such basic human needs as housing, food, health care and education.

AmeriCorps began in 1994, fulfilling a campaign pledge by President Clinton to provide education benefits to young people who give some time to community service. It was an idea championed by the Democratic Leadership Council, which from its start almost a decade earlier had included national service as one of its dis-



REUTERS

Jim Hoagland

Two Who Seized The Moment

The vast wind machines that modern political leaders employ to create word pictures of themselves in the usually otherwise occupied minds of their citizens count for relatively little in times of true crisis. Existential threats draw out and expose the true nature of leadership and of those who practice it.

Abroad, two men stand out in quickly grasping the possibilities that rise from the terror of Sept. 11 and the Bush administration's efforts to shape the international environment for a U.S. response. In very different ways, Britain's Tony Blair and Russia's Vladimir Putin see opportunities in this crisis and reach for them.

Less than a month into a struggle that President Bush declares will last for years, Blair and Putin have articulated separate visions of where the war on terrorism can take the world. These visions are powered by self-interest and national ambitions, not surprisingly. But both go beyond simple self-interest to link today's actions to tomorrow's consequences and to the fate of their nations.

Caution and haggling have emerged as the default position for many nations as the initial waves of shock and sympathy subside. Saudis, Egyptians, Chinese and others respond to Washington's stress on coalition-building by asking the first question of politics-as-usual: What's in it for me? The American tab for asking other nations to do the right thing threatens to be enormous, if not unpayable, over the long haul.

But Blair and Putin see a moment in which power relationships in the world can be changed in profound ways by ideas and new thinking as well as by bargaining. They are willing to make down payments on the future and thus to influence it.

Important distinctions need to be made between two leaders who act independently. I have in the past praised Blair's determination to pursue a new moral world order (especially during the Kosovo emergency) and questioned Putin's commitment to democracy and his tolerance of Russian atrocities in Chechnya. These filters remain and no doubt color my perceptions.

But the political behavior of Blair and Putin in recent days transcends and alters established images. These relatively youthful men (Blair is 48; Putin turns 49 today) do not run from dramatic change. They run to lead it in their direction.

It is not possible in this space to do justice to the masterful, intensely personal speech Blair gave last Tuesday to his Labor Party's annual convention. He outlined why and how the campaigns to end terrorism and the conditions that help sustain terrorism must be

Amy Smithson

Doomsday

If Americans are to regain peace of mind about their everyday lives, the government must broach with more clarity the all too frightening subjects of chemical and biological terrorism. Already reeling from the events of Sept. 11, the country has been bombarded by the media with warnings that terrorists will turn next to poison gas or germ weapons.

The subject of unconventional terrorism is easy prey for commentators and individuals all too readily labeled "expert," even those with a somewhat tenuous grasp of the topic or financial interests at play. The public and far too many policymakers do not understand the substantial technical hurdles associated with making and dispersing chemical and biological agents so that massive casualties result. That's why people usually believe the worst of what they hear.

A case in point is the dust-up about crop-dusters. Press reports implied that these instruments of America's agricultural prowess were just a snap away from raining chemical or biological warfare agents on hapless citizens. Practically everyone has been scared stiff.

In fact, a pilot with limited experience, such as those who flew the ill-fated aircraft on Sept. 11, would need lengthy instruction just to avoid crashing a loaded crop-duster on takeoff. Because the close-knit aerial spraying community tends to clam up when strangers get nosy, Mohamed Atta was not even allowed to peer into the cockpit of one of those planes.

True, crop-dusters spray chemicals, but wind currents will disperse and carry away a toxic hazard. People can gain a great deal of protection just by going inside if they see a crop-duster overhead. Moreover, the

George F. Will

Another Un

The elemental lesson to be learned from Sept. 11 is that *nothing* is unthinkable, although many possibilities are unthought, particularly by peaceful nations. So perhaps now Americans should think about the possibility of a swift, because remarkably brutal, conquest of Taiwan by the People's Republic of China.

It is U.S. strategic doctrine that the armed forces should be sufficient to

national service as one of its distinctive policy proposals.

It is only recently that Republicans have come to embrace the concept, but when AmeriCorps was up for renewal last year, 49 of the 50 governors endorsed it—most of them Republicans. They like the program because it is run out of the state capitals and because the AmeriCorps volunteers work for the same community groups that governors and mayors count on to deliver human services.

Habitat for Humanity, the Red Cross and other organizations use AmeriCorps volunteers—who are available to them full-time—to help organize their part-time and temporary citizen-helpers, thus multiplying the effectiveness of this grass-roots workforce. Teachers and principals deploy them as mentors and tutors. Some already work with local police departments and help out in floods and other natural disasters.

While the full details of the McCain-Bayh proposal are still in the works, the basic idea is to expand the ranks of AmeriCorps, which now have leveled off at 50,000, to five times that number by 2009, so that every four years, 1 million young Americans would have the exalting experience of giving a year of their lives to their country. The McCain-Bayh bill and a companion bipartisan measure in the House would continue the current policy of awarding an education grant (currently \$4,725) to each person who completes a year of service.

In our interview and in an article in the Washington Monthly, McCain said he had been particularly impressed by the esprit and energy of young people in two small AmeriCorps programs where they live and work together, wearing distinctive uniforms and functioning as teams.

That semi-military approach might be particularly appropriate for some of the homeland defense functions. Bayh and McCain also want to encourage more of the college students now on work-study programs to give up their menial campus jobs and instead undertake community service projects.

McCain also plans to lobby the Pentagon to develop a more flexible enlistment policy for the armed services—perhaps one where a recruit would serve 18 months on active duty and 18 months in the Reserves and walk away with \$18,000 in college grants.

His goal—and it is an important one—is to increase the number of future national leaders with firsthand experience in the armed services, closing the worrisome gap between the civilian and military cultures.

In this, and every other way, expanded opportunities for national service could be a great response to the Sept. 11 tragedy.

terrorism and the conditions that help sustain terrorism must be waged jointly. He made a powerful case for supporting not just an American president but also America's imperfect but dynamic society. And he traced the way in which Britain could soon become an integral part of a new, transformed Europe.

"Tony Blair hopes that the world anti-terror campaign will make Europe mean something. He wants Europe to matter to itself, to its citizens and to the Americans," the Guardian's Hugo Young wrote of the speech. The other, fearful side of that coin was put to me in Washington by Claude Imbert, founder and publisher of Le Point magazine in Paris:

"I worry about Europe's response to this crisis. This is a moment for conviction and optimism, such as I find in America now, not for the cynicism and subtleties of diplomacy and politics as often practiced in Europe."

In Brussels on Wednesday, Putin made a skillful bid to enlarge the opening for Russia in Europe's most important institutions and ambitions. He sought to hitch Russia's wagon to the urgency of the anti-terrorism horse.

He outlined a program of cooperation with the European Union on Russian membership in the World Trade Organization. Putin also advanced a promising dialogue nurtured by NATO Secretary General George Robertson by imagining out loud that NATO membership for the Baltic states and perhaps eventually for Russia could contribute to stability in Europe. He did this after overruling his military on cooperating extensively with Washington on Afghanistan.

Actions will count far more than words in the days to come. But history's door is swinging on its hinges, as the humanistic agenda of Blair and the skillful opportunism of Putin both demonstrate.

It has been said that Sept. 11 has already changed world politics and foreign relations. That is a premature judgment. Blair and Putin both understand that the direction of that change is not inevitable or easily foreseeable. It can be channeled by imagination and effort. Influencing the dramatic change to come is still an option for genuine leaders; halting that change is not.

David Ignatius

A 'Netwar' Clash

Many thoughtful people worry, even if they don't say so out loud, that the savage suicide attacks of Sept. 11 marked the beginning of a "clash of civilizations," in Harvard professor Samuel P. Huntington's phrase—a new world war between Islam and the West.

What the world confronts now, however, isn't a religious war but something far more diffuse and delicate—a "netwar," to use a term coined by two innovative scholars from the Rand Corp.

The "clash of civilizations" analysis is misleading, because it treats the Islamic world as a monolith—a modern version of the disciplined and implacable Ottoman armies marching toward the gates of Vienna.

The Islamic world is far more cacophonous and disorganized than that—riven by sects and tribes, secularists and fundamentalists, mulahs and military officers.

This fragmented world of Islam has produced some strange alliances. During the Cold War years, the United States helped support Islamist forces as a bulwark against radical, secular regimes such as Iraq, Syria and Nasser's Egypt, which were allied with the Soviet Union.

The culmination of that strategy was America's support for Islamic fundamentalists in Af-

ghanistan—a move that helped win the Cold War but also created America's new enemies, the Taliban and Osama bin Laden.

Israel played similar games in Lebanon during the late 1970s and early '80s, attempting to ally with Shiite and Druze Muslims against the secular leadership of the Palestine Liberation Organization. To say that this strategy backfired is to put it mildly.

It is a noteworthy fact, in this regard, that the first modern war to contain revolutionary Islam was fought not by the United States or Israel but by Iraq in the 1980s against Iran.

The lesson is that nothing in this part of the world turns out quite the way you planned. That's why a clash of civilizations won't happen—the world of Islam is too complicated and shifting a landscape, with too many internal battles.

What does seem likely is that we are witnessing the first "netwar." That phrase is drawn from a fascinating paper that was posted on the Internet last week by David Ronfeldt and John Arquilla of Rand. (It can be found at www.firstmonday.org.)

The authors coined the term back in 1993 to describe what they saw as the future of warfare. The West's opponents wouldn't be traditional armies or hierarchical political movements, or

armed forces should be sufficient to successfully fight two major regional conflicts simultaneously. Forces sufficient for one are being deployed to Southwest Asia. A second such conflict could erupt in Southeast Asia, explains professor Richard L. Russell of the National Defense University. His "devil's advocate analysis"—written before Sept. 11—appears in *Parameters*, the U.S. Army War College quarterly.

America's sanguine assumption is that China lacks the necessary force-projection capabilities. It is deficient in amphibious ships and other means of delivering troops by water, particularly given that Taiwan's pilots and aircraft (F-16s and Mirage 2000s) are superior to China's.

But China could confound that assumption using surprise, a "force multiplier." China could use amphibious assaults only as diversions to draw Taiwanese ground forces away from the primary invasion points—air bases. And China could employ unprecedented ruthlessness—tactical nuclear weapons and chemical weapons.

Such surprise and ruthlessness may seem far-fetched—as far-fetched as the idea of using commercial aircraft as bombs to level skyscrapers would have seemed a month ago, had anyone imagined it. However, Russell notes that Pearl Harbor, Germany's attack on the Soviet Union, North Korea's invasion of South Korea, China's

even organized guerrilla operated like the disc nodes of an electronic

"These protagonist dispersed organizationals who communicate their campaigns i often without a central feldt and Arquilla in cells would be everyw those of bin Laden's al

The netwar authors are highly relevant to rorism. "Hierarchies h ing networks," they nc for war planners at th of the most hierarchic vised.

"A particular challe American bureaucrac deep, all-channel netv itary, law enforcemen ments whose collab achieving success," warn.

"It takes networks i insist. In other words, its allies march off in stan against a dispers

Students Reassess Career Choices, Look

SERVICE, From E1

careers to reconsider.

It could be enough to make Washington—the older, limestone-building kind—cool again.

Some in the region say that if the new interest in public service takes root, it would bring fundamental changes to Washington, as it has in the past. The city's transformation from sleepy town to world capital was heralded by waves of smart, ambitious young people. It happened during the New Deal, World War II, the Great Society programs and the Vietnam War.

Some longtime Washington players believe that the same could happen again as a wave of talent descends on the city to contribute to the war against terrorism.

"Unfortunately as it is, this may have made young people decide the public sector isn't so bad after all," said Robert A. Peck, president of the Greater Washington Board of Trade and a lifelong resident of the area. "Washington was really built on these influxes."

"The contrast between the Washington I left in 1959 and the one I returned to in 1967 was remarkable," said David Eisenhower, grandson of Dwight D. Eisenhower and a public policy fellow at the Annenberg School of Communication at the University of Pennsylvania.

"War or great social projects enlist scores of young people to public service. I'm seeing signs that this could be happening again," he said, citing events since Sept. 11 and the increased number of students who worked for presidential campaigns in 2000.

Thirty-two percent of college students nationwide are more interested in public service careers now than a year ago, compared with 7 percent who are less interested, according to a survey by the career consultancy HotU Inc.

Newfound enthusiasm for public service notwithstanding, Kippins is still in the minority. Most of her fellow business students at Wharton continue to plan careers in traditional private-sector fields such as investment banking and consulting.

But for many students at Wharton, the Sept. 11 attacks changed assumptions about what a career should be.

Dan Diamond, a Penn senior who interned at two Washington area dot-coms, is applying to the Foreign Service. John Primerano, who was planning to continue making short, low-budget humor films after graduation to try to break into Hollywood, is seriously considering applying to work at the CIA.

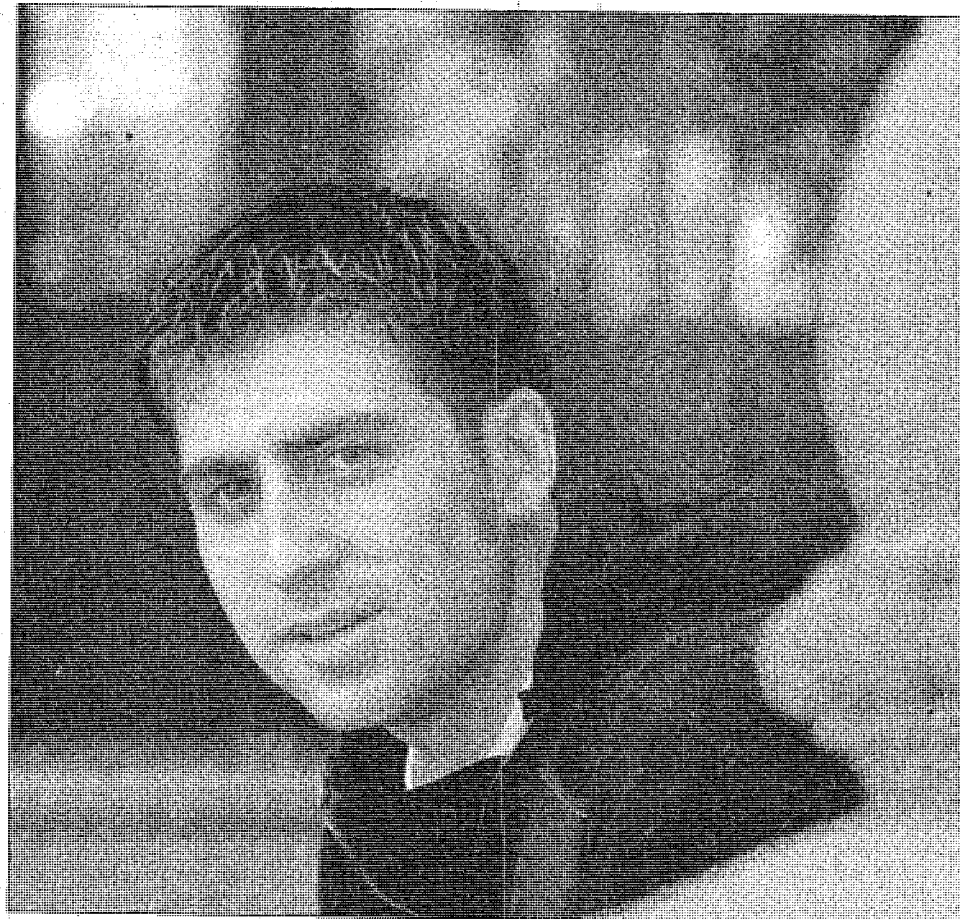
The trend is evident to varying degrees nationwide.

Rivka Schreiber, 23, who moved to Washington this summer from Flushing, N.Y., had planned to work for an Internet company but it went bankrupt. Now she wants to use her computer skills with a defense or government organization.

"It's one thing to know at the end of the day your work goes to getting a shareholder a little richer," she said. "I'd rather use my work to better the world."

At PoliTemps, a political staffing service, applications are up 40 percent since the summer, likely owing to the slow economy, and about 15 percent since Sept. 11, owing to a renewed sense of public service, said Chris Jones, the organization's founder.

At Georgetown University's McDonough School of Business, some students who had planned to work for big corporations are now looking at nonprofits like the American Red Cross, said Toni Della-Ratta, asso-



PHOTOS BY WILLIAM THOMAS CAIN F

University of Pennsylvania senior Dan Diamond interned at D.C.-area dot-coms. He is applying to the For

ciate director of career management.

Of course, their revised plans may not be entirely altruistic. Even before the attacks, banks and consulting firms were hiring less because of the lackluster economy. Since Sept. 11, as economic conditions worsened, private-sector jobs are even harder to come by.

"It's hard to get a job on Wall Street right now," conceded Steve, a Georgetown senior who declined to give his last name because he is pursuing a job with an intelligence agency.

But even when opportunism is a reason for the shift, the young adults leaning toward government service mention more noble factors in their change of direction.

Michael, another Georgetown senior who didn't want to give his name because of interest in intelligence jobs, said the attacks rekindled a sense of patriotism that made government service more desirable. Friends who once chatted about last week's party now want to discuss current affairs.

Diamond interned at VarsityBooks.com Inc. in Washington and Sandbox.com Inc. in Reston during his summers, and envisioned working at one of those or another tech company when he graduated. VarsityBooks, renamed Varsity Group, is a tiny shell of its former self and Sandbox has been sold, eliminating those options.

So early this year Diamond considered other possibilities for his first job out of college, mainly along the lines of investment banking or consulting. After Sept.

11, that changed.

He pointed at a brochure that had been papers in his room: "U.S. Foreign Service First Line of Defense."

"That sort of thing seemed like promising before all of this," Diamond said. "But I realize that it's really true."

"A lot of college students got to a place and feel so special, but then go join the everyone else," he said. "I never thought it was my calling, but now it would be nice to lend a hand."

Primerano spent his college career in movies, many of them mocking the drug-dealing tables and other part-time jobs he's had. In 11, he said, he watched the Trade Center it felt like the world was ending.

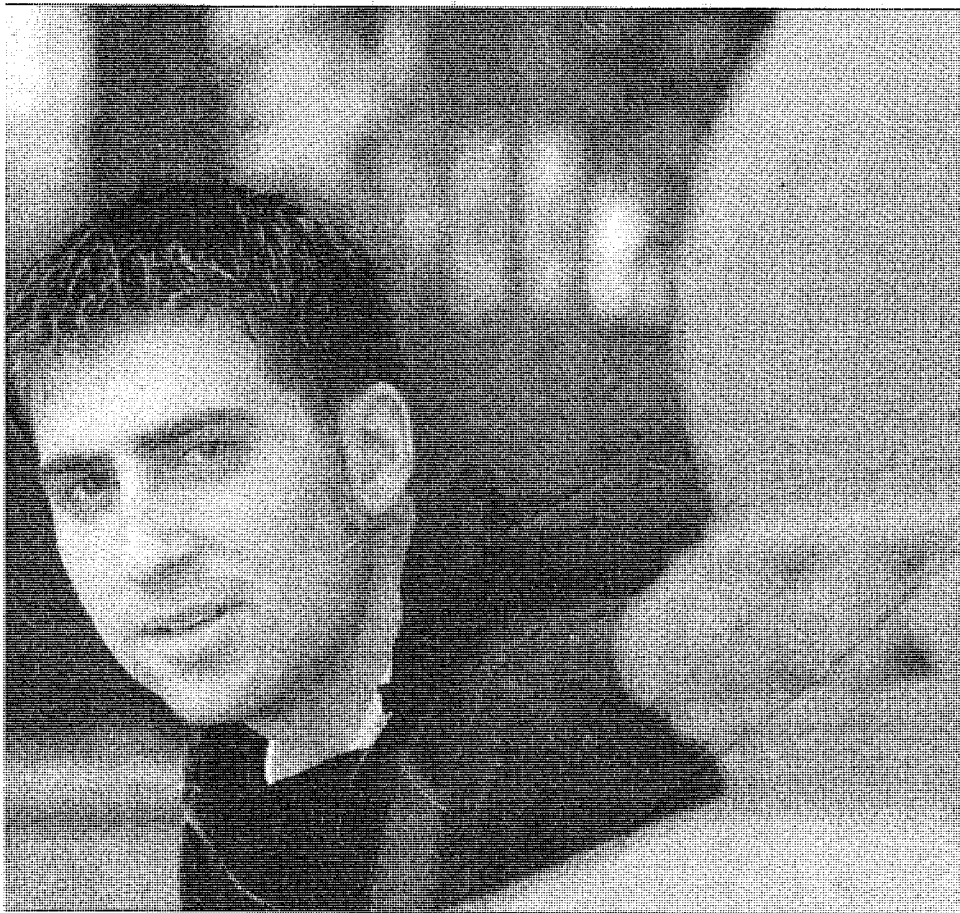
Primerano considers himself something of a socialist and never envisioned becoming part of the industrial complex. But lately he's been looking at the CIA's recruitment Web site, looking for his skills manipulating digital video might be useful to the organization.

Kippins, the would-be financier who now wants to join the Peace Corps, cried as she recalled the Sept. 11 attacks. She grew up in Queens and went to school in the shadow of the Trade Center.

"It's not quite like going home now. I went home, I drove over the 59th Street Bridge, looked down and the Trade Center was kind of hit me," she said. "I hate feeling like

Preservation Copy

Career Choices, Look to Public Service



PHOTOS BY WILLIAM THOMAS CAIN FOR THE WASHINGTON POST

Pennsylvania senior Dan Diamond interned at D.C.-area dot-coms. He is applying to the Foreign Service.

of career management. Their revised plans may not be entirely new before the attacks, banks and consulting firms hiring less because of the lackluster economy Sept. 11, as economic conditions in the private-sector jobs are even harder to

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Another Georgetown senior who didn't name his company because of interest in internships, said the attacks rekindled a sense of purpose that made government service more desirable. She once chatted about last week's parlor discussion of current affairs.

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"That sort of thing seemed like promotional hooey before all of this," Diamond said. "But now you realize that it's really true."

"A lot of college students got to a place like Penn, and feel so special, but then go join the rat race like everyone else," he said. "I never thought government was my calling, but now it would be nice to be able to lend a hand."

Primerano spent his college career making humor movies, many of them mocking the drudgery of waiting tables and other part-time jobs he's held. On Sept. 11, he said, he watched the Trade Center collapse and it felt like the world was ending.

Primerano considers himself something of a pacifist and never envisioned becoming part of the military industrial complex. But lately he's been surfing the CIA's recruitment Web site, looking into whether his skills manipulating digital video might make him useful to the organization.

Kippins, the would-be financier who now aspires to join the Peace Corps, cried as she recalled Sept. 11. She grew up in Queens and went to school in the shadow of the Trade Center.

"It's not quite like going home now. The last time I went home, I drove over the 59th Street Bridge and looked down and the Trade Center wasn't there. It's kind of hit me," she said. "I hate feeling helpless."



John Primerano, who aspired to a career in Hollywood, wonders if the CIA could use his video-editing skills.

Her way of helping is to toss out plans for a life of million-dollar bonuses and fast-paced securities trading for a volunteer gig in a developing country with the Peace Corps.

"I don't care where they put me. I just want to help out," she said. "Anybody in the Peace Corps is kind of an ambassador for the U.S. Hopefully if just a couple of people could see that we're not all that bad it could make a difference."

Lincoln Brown, another senior at Penn, grew up in politics; several members of his family, including his father, held state offices in Kentucky.

He never liked it.

He disliked all the handshaking and promises and public preening, and planned instead to become a lawyer and live out a happy and lucrative career in corporate law.

Brown still plans to pursue a law degree and work in the private sector. But in the past six weeks, as he's watched national leaders work together to unite the country and respond to terrorism, he's come to a different mind about his long-term future.

He now thinks he would like to run for office one day and do just that sort of work.

"I now understand why my dad has always told me it's the best thing you can do."



PARADISE

Former President Jimmy Carter with (clockwise from left) Matt Westermarland, 14, Makenna Butler, 17, Ricky Taylor, 16, Jacquelyn Hughes, 15, Diego Suarez, 8, and Jason Russell, 9. These young "Heroes on Atlanta" volunteers are helping to improve their community.

Former President JIMMY CARTER, along with millions of young Americans, invites us all to serve others.

Join Us, Be A Volunteer

BY MICHAEL RYAN

INSIDE: Celebrate Life's Possibilities...By Robert H. Schuller

More than 13 million young volunteers nationwide participate in year-round service projects to help their neighbors and rebuild their communities. They remind us that we must not forget...

Every Day Is A Chance To Serve

BY MICHAEL RYAN

KELLY ALLEN SPENDS much of her time the way most high school students do: working, studying, seeing friends, relaxing. But a visitor to the 17-year-old's Abington, Pa., home might find Kelly, a junior at Abington High School, hunched over a machine usually seen in an eye doctor's office. Since last spring, she has patiently measured the prescription strength of hundreds of pairs of used eyeglasses and then carefully catalogued them. "My classmates and I collected them throughout the community," Kelly explains. "We put refurbished mailboxes around where people can drop them off, and kids go around and pick them up." Next year, she will travel to Mexico with a team of optometrists to deliver the glasses to poor people near Guadalajara.

Kelly is one of a growing number of young people who are devoting themselves to helping others. According to the Gallup Organization, approximately 13.3 million teenage Americans donate time and effort in service to their communities each week—that's a participation rate of almost 60%, compared to almost 50% for adults. "Too many people sit around feeling bored, not doing anything constructive," Kelly says. "They'd feel a lot better helping people."

In April, three million volunteers between 5 and 25 years old participated in National Youth Service Day—an annual nationwide event organized by Youth Service America and the National Youth Leadership Council in conjunction with



A VISION TO HELP OTHERS

Kelly Allen (front) with (l-r) Sarangi Patel, Kristen Allen and Dan Weinstein, all 17, of Abington (Pa.) High School collect used eyeglasses to donate to those in need.

PARADE and 65 other national partners and corporate sponsors. "Every year on National Youth Service Day, hundreds of thousands of young people are introduced to volunteering," says Steve Culbertson, president and CEO of Youth Service America. "For many of these young volunteers, this represents the critical first step in a life-long commitment to service to others. More than 75% of all adult volunteers had their first service experience as a child." Next year, the event will be held April 26-28. But, as Kelly demonstrates, service is not a once-a-year event

The number of young people who are devoting themselves to helping others is increasing across the country.

for most of these young volunteers. They bring the same passion and commitment to service throughout the year.

The National Youth Service Day spirit was particularly strong after the tragedies at the World Trade Center, the Pentagon and in Pennsylvania. In Wareham, Mass., for instance, elementary and high school students joined students from the University of Massachusetts—Dartmouth—to organize a march and concert against violence. The proceeds will go to disaster relief.

Whether in times of crisis or calm,

the intense personal satisfaction of service is what young people always bring up when they talk about volunteering. "I feel like a better person because I am helping people," Kelly says.

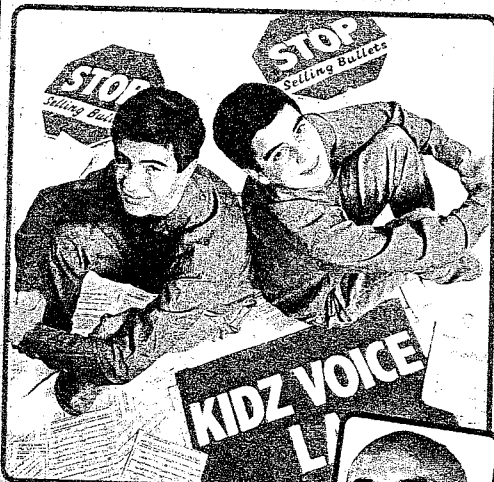
"Volunteering has opened my eyes to the world," says Matthew Patterson, 17, of Atlanta, who tends a community garden that raises vegetables for people in need. "The food goes straight from the garden to their dinner table."

Young people have realized that service does not necessarily mean working in an established program, or even taking orders from adults. Twin brothers Theo and Niko Milonopoulos, 14, of Los Angeles were shocked when a car-jacker shot and killed Ennis Cosby, the son of comedian Bill Cosby, near their



A GARDEN OF GIVING

Matthew Patterson, 17, of Atlanta, says tending to a community garden has "opened my eyes to the world."



A VOICE TO BE HEARD

Twin brothers Niko (l) and Theo Milonopoulos, 14, created an anti-violence group in 1998 after Ennis Cosby (inset), son of Bill Cosby, was killed near their school.



school in 1997. "We were horrified. Violence had never touched us," Theo recalls. "A few weeks later, there was an armed robbery in a bank near us. Then the school shootings around the country began. You could not go anywhere without fear of being shot."

"At first, we thought we couldn't do anything about it. Then we thought somebody else would. But nobody did." The twins went to the library and discovered that 150 kids are killed by gun violence in their city each year. They researched the legislative process and introduced a bill in the city council to ban the sale of ammunition within city limits. (The bill, which is still pending, contains exceptions for hunters and target shooters.)

In 1998, the brothers founded Kidz Voice-LA and organized an anti-violence march that drew hundreds of teens and even brought out L.A.'s then-

continued

'We'll always be idealists and activists. We'll always be involved in service.'

Get Involved Today

To learn more about service projects in your community, visit the Youth Service America Web site at www.SERVE.net.org or write to: Youth Service America, 1101 15th Street, NW, Dept. P, Suite 200, Washington, D.C. 20005. And for more about the next National Youth Service Day (April 26-28, 2002), send an e-mail to nytd@ysa.org. Don't wait. Become a volunteer today.

Give The Greatest Gift Of All

BY JIMMY CARTER

As we approach the holiday season and begin to make our shopping lists, we should keep in mind that the greatest gift we can give to others—and to ourselves—may not come with a ribbon around it. So says former President Jimmy Carter in this adaptation from his new book "Christmas in Plains," just published by Simon & Schuster.

FIRST MET CURTIS JACKSON IN THE 1950s. He was an old-timer around Plains, Ga. In fact, he was born and spent his early adulthood with his eight brothers and six sisters on the farm of my wife Rosalynn's grandfather. Curtis was a sharecropper but later got a job at a sawmill where he lost his right leg just above the knee in an accident. When he could walk again, Curtis worked as a handyman. I hired him to help me tend to our yard and fishpond.

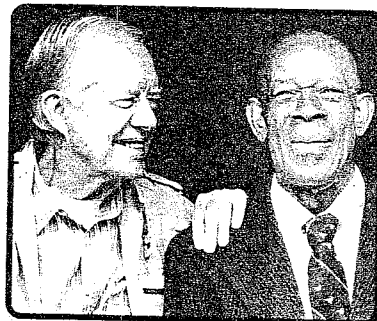
Curtis was a wonderful raconteur. He loved to describe his boyhood memories of farm life. Although we never knew each other in those early days, he was a contemporary of mine and we shared a lot of similar experiences. Curtis helped refresh my memory as I took notes that later resurfaced in my book *An Hour Before Daylight*.

When Curtis's wife, Martha, became ill, Rosalynn and I went to visit her. We were appalled at their ramshackle house. It had no heat except a small wood stove, we could see through the walls in several places, and there were buckets around to catch the water that came through the roof when it rained. Curtis said, "It's good on clear nights. We can see the stars from our bed."

A few months later, when Martha had to be admitted to a nursing home temporarily, Rosalynn and I decided that the Jacksons needed a new house. We talked it over with the folks in our church. We were already involved with Habitat for Humanity, an organization devoted to providing homes for needy families (the international headquarters is in Americus, just 10 miles from Plains), and Curtis and Martha easily qualified for the program.

Habitat's normal policy is that the future homeowner's family members should put in 500 hours of work and pay the full cost of their new house, including materials and labor. At the same time, we follow the Biblical prohibition against charging interest to a poor person. With 20 years to pay, this would keep Curtis's monthly payments low enough so he could afford them from his Social Security income.

Curtis couldn't read or write, so we prepared the papers, and he helped our vol-



Former President Jimmy Carter helped build a house for his friend, Curtis Jackson.

unteers clear a site near his old house. Since he was physically handicapped, his wife was ill, and they had no children, Curtis needed help to fulfill the work requirement.

The people in Plains responded enthusiastically to our call for volunteers. We soon had enough to set Christmas Eve as a target date for completion. We spent the last two days and nights putting on final touches: laying carpets and tile floors, planting shrubbery, trimming doors and windows, installing a new stove, refrigerator and a heating system and hanging paintings on the walls.

Our children and grandchildren who came to Plains for Christmas joined us, and we labored until dark on Christmas Eve to complete the multitude of last-minute tasks.

That evening, Curtis picked up Martha and brought her home to their new house. I think it's true to say that most of us had forgotten all about Santa Claus, but Curtis and Martha hadn't. And for those of us who had helped put down the floors and raise the roof, that made it the best Christmas of all.

The foregoing is an adaptation from "Christmas in Plains" copyright © 2001, by Jimmy Carter, published by Simon & Schuster.

'When we needed volunteers, the people in Plains responded to our call.'

A CHANCE TO SERVE/continued

district attorney and police chief as participants. They also have collected donations to assemble 5000 backpacks filled with toiletries and other necessities for homeless young people in the Hollywood area. In addition, Theo and Niko are planning a driver-safety program for teens. "We'll always be idealists and activists," Theo says. "We'll always be involved in service."

Some young people come to service to rectify wrongs they've seen in their own lives. Michael Kent Kay, 14, of Wilmington, Ill., had seen his brother, Kyle, 9, treated insensitively on repeated occasions. In a wheelchair for cerebral palsy, unable to control his movements, Kyle was an uncomfortable sight for

some people. "A portrait studio refused to take his picture," Kent recalls. "They just said, 'We can't do it,' and never explained. Another time we were at a restaurant when they came and took his plate before he had a single bite. They just said, 'He's done.'"

Kent decided to do something to change people's attitudes. In 1999, he enlisted the kids and adults in his local 4-H chapter to help him found Share-A-Friend, which has matched 50 able-bodied volunteers with 60 residents with disabilities who live in group homes around Wilmington. "They get to know each other really well," says Kent, who raises half his funding from the community. "We've gone to movie theaters and an amusement park. We get them bal-

Not all teens begin as volunteers. More than 34% of U.S. high schools have adopted service-learning programs.

loons on their birthdays." For his work, Kent received the YSA-Hasbro Teens With the Courage To Give Award.

Earlier this year, Kyle died of complications from cerebral palsy, but Kent's work continues. His ambition is to make Share-A-Friend totally donation-supported and, eventually, a national organization. "I want the younger generation to get acquainted with the disabled," he says. "Younger volunteers may be afraid at first, but once they meet the residents of the homes, they get excited." (Youth who face physical and mental challenges also made a great contribution to National Youth Service Day this year, participating in more than 100 projects.)

Not every young person begins service work as a volunteer. More than 34% of U.S. high schools have adopted a formal service-learning program, where volunteer work is linked to academics. Atlanta requires students to devote 75 hours to community service during four years of high school. About a third do much more. "Often, at the beginning, there's a negative tone to students' attitudes," says Shannon McDole, of Hands on Atlanta, a volunteer-resource center. "Slowly but surely, the attitude becomes more positive." Students RaShawn Butler, 17, Tonya Tatum, 17, and Keisha Hughley, 16, of Atlanta's Frederick Douglass High School have all given more than twice the required 75 hours as mentors and tutors to grade school children. "At first, I thought that was all I'd do," says Tonya. "But service has made me see things differently. I want to build the community."

Students who start out reluctant to perform service often catch the spark and become avid volunteers. In Abington, Pa., senior Tim Gethers, 17, has become a key link in the chain of students, including Kelly Allen, who collect eyeglasses to take to Mexico. A vocational student, he admits that he was skeptical about community service until coordinator Mary Rodgers put him in charge of refurbishing an old mailbox. Although he was only required to work 15 hours, he put in three weeks sanding, patching cracks, finishing and painting the old box—and now he's looking forward to doing another. "Helping other people—it's a good gesture," Tim says quietly. "To tell you the truth, it makes me feel good. I'm helping people. I like that."



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