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U.S. DEPARTMENT OF COMMERCE AND
NATIONAL PARTNERSHIP FOR REINVENTING GOVERNMENT
BENCHMARKING STUDY

PRINCIPLES & RECOMMENDED PRACTICES FOR EFFECTIVE ADVERTISING IN THE AMERICAN MULTICULTURAL MARKETPLACE

Published by the American Advertising Foundation & the American Advertising Federation

THE AAF FOUNDATION

BUILDING BRIDGES BETWEEN ADVERTISING EDUCATION & THE PROFESSION

Advertising Industry Consensus on Tough Issues

The *Principles for Effective Advertising in the American Multicultural Marketplace* and its companion *Recommended Practices* embody the consensus of over 30 committee members who represent national advertisers, general market advertising agencies, minority-owned and focused agencies and minority-owned and focused media outlets. Under the auspices of The AAF Foundation and the AAF Board of Directors Multicultural Task Force, the Business Practices Review Committee (BPRC) deliberated for almost a full year and addressed many difficult issues.

The content of the documents reflects the group's answers to these kinds of questions, which are significant for all industry companies, large and small:

- How can we maximize the benefits of diversity and inclusion throughout our operating processes — from strategic planning and decision-making to creative executions and media buying?

- How can companies ensure that advertising and marketing decision-makers are well-informed about multicultural consumers in the United States? What questions should we ask?

- How can companies ensure that advertising and marketing efforts demonstrate respect for all consumers?

- How can we foster a business culture that encourages openness to new information and minority marketing communications resources?

Why were the *Principles* and *Recommended Practices* needed?

The initiative was announced in January 1999 when FCC Chairman William Kennard called for an industry code of conduct in response to alleged findings of discrimination in ad rates paid to minority broadcasters. In addition to a statistical analysis, the FCC-commissioned study, "When Being Number One is Not Enough," cited anecdotal evidence of practices including "no urban/no Spanish dictates," which amount to bans on advertising with media that target African American and Hispanic consumers. In some instances these bans appeared to be based on mistaken stereotypes about minorities.

This report, along with the release of the controversial Katz memo that described minority consumers as "suspects not prospects" and information gathered during AAF's 1998 Congressional Summit on Diversity in Advertising, supported long-standing claims of problems experienced by minority agencies as well as by minority-owned and formatted media — including some AAF members. During this summit, U.S. Representatives Robert Menendez (D-NJ) and Caroyln Cheeks Kilpatrick (D-MI) answered the call for congressional advocacy on behalf of minority companies.

These and other events, such as the formation of the Madison Avenue Initiative (a group of over 50 African American, Hispanic and Asian agencies and media companies, headed by the Reverend Al Sharpton), underscored the need for a blueprint to help industry companies recognize and meet their needs for greater diversity, for accurate information about multicultural consumer segments and for greater access to expertise and resources provided by minority-owned and focused companies.

Finally, the realities of the multicultural marketplace and advertising's slow adaptation to those realities are at the heart of this and all AAF diversity and multicultural initiatives:

- Already, people of color comprise nearly 30 percent of our population. Demographers forecast that by the year 2050 there will be no majority ethnic group. The combined spending power of African American, Hispanic and Asian consumers in the U.S. approaches $1 trillion.

- Although consumer researchers and social scientists have long demonstrated that minority consumers have distinct cultures and do not completely assimilate, advertising practices do not typically take full advantage of this information. The evidence lies in the numbers. Approximately $2.5 billion in advertising (approximately 1.25 percent of total ad spending in excess of $200 billion) is being spent to directly address the ethnic markets that account for almost 30 percent of our population.

- One study estimates that only 4 percent of those working in the U.S. ad industry are people of color. Census data shows that less than 10 percent of industry managers are African American, Hispanic or Asian; less than 2 percent of the industry's senior executives are minorities. It appears that less than 1 percent of general market advertising agencies' managers are of color. A recent study indicates that minority-owned agencies and media companies are the most likely employers of minority managers and senior executives.

The Business Practices Review Committee Mission

- To identify the rationale, business and ethical paradigms that companies need to effectively promote growth, diversity and fairness in a multicultural marketplace
- To recommend practical guidelines that will help individual companies manage against those paradigms to achieve their goals
- To identify industry-wide initiatives that will be needed to support widespread adoption and successful implementation of these principles and practices

Committee Make Up

The identity of companies and their representatives will be revealed during the national roll out of the *Principles* and *Practices*. Representing four key industry business segments, national advertisers, general market agencies, minority advertising agencies and minority media, the team of co-chairs includes the following: Robert L. Wehling, global marketing officer, Procter & Gamble; David Bell, chairman, True North Communications; Samuel Chisholm, chairman and CEO, The Chisholm-Mingo Group and Raul Alarcon, president, Spanish Broadcasting System. AAF contributors included Wally Snyder, president & CEO; Heide L. Gardner, vice president, diversity and strategic programs, The AAF Foundation; Jeffry L. Perlman, senior vice president, government affairs and Rebecca L. Martin, program assistant, The AAF Foundation. Meeting facilitators included Susan M. Maruca, associate director, human resources, Procter and Gamble - Advertising, and Heide Gardner, AAF.

Principles for Effective Advertising in the American Multicultural Marketplace

Preamble

Diversity and inclusion are priorities for the advertising, marketing and media industry because they are essential to our collective ability to achieve our objectives for growth and profitability. Our commitment to diversity starts at the top of our organizations and is a crucial part of everyone's daily work. Multicultural consumer segments are valued as America's "emerging growth markets." Effectively reaching these customers and contributing to the well-being of their communities are business imperatives in this increasingly multicultural nation.

Advertisers benefit from collaboration with general market and multicultural advertising agencies to develop world-class advertising that both delights and informs consumers. Development of such advertising requires that racially and culturally diverse decision-makers for marketers and all advertising agencies take advantage of a wide range of expertise and resources. The doors of competition must be open to multicultural and minority-owned agencies, production and music houses and media options. Opportunities to compete and compensation must be fair for all.

Principles

Accordingly, the following principles should guide our business practices to increase prosperity for all involved in the advertising, marketing and media industry:

Commit to identify and take advantage of growth opportunities in multicultural markets

In the advertising, marketing and media industries, we seek first to understand our markets and the communities we serve. We value a racially and culturally holistic approach to advertising and marketing. We make fully informed decisions by researching and evaluating consumer buying habits, current contributions to sales and/or profitability as well as growth potential. Our commitment includes investing sufficient financial resources commensurate with opportunities in all market segments and necessary to bring about the desired results.

Generate ideas and profits by practicing inclusiveness and fairness

We seek to promote the highest levels of creativity and success by promoting inclusiveness and fairness throughout the marketing and advertising processes — from employment and career advancement within our organizations to competition and compensation for creative services and media buys. Collaboration between the general market agency, multicultural specialist agency and client team at the beginning of the overall planning process enhances our effectiveness and the likelihood of achieving goals.

Require accountability and measurable results

We require compliance with these principles in service to our clients, our customers, our employees and their communities, both as individual companies, and as an industry. By measuring and reporting on the effectiveness of our efforts, we can better target resources, increase return on investment and identify what works. By sharing what works, we stimulate innovation in our organizations and industries.

ADDENDUM:

RECOMMENDED PRACTICES FOR EFFECTIVE ADVERTISING IN THE AMERICAN MULTICULTURAL MARKETPLACE

Having agreed on the *Principles for Effective Advertising in the American Multicultural Marketplace*, the American Advertising Federation and AAF Foundation Business Practices Review Committee (BPRC) identified practical methods that can help companies achieve their unique goals.

The BPRC arrived at consensus on these broad strategic recommendations for executives to consider as they look for ways to manage against the business and ethical paradigms established in the *Principles:*

Principle 1:
Commit to identify and take advantage of growth opportunities in multicultural markets

Recommendations for thorough research and market evaluations

- Conduct annual brand consumer audits to determine *effectiveness in reaching and selling to all audiences.* Include specialists in multicultural markets in the review team which would include the client and general market agencies. Variables to be examined should include actual sales volume and market share by consumer segment as well as measures like awareness and recall. Comparisons and contrasts with competitors' performance also are recommended.

- In addition to traditional demographic specifications for age and income, advertisers and advertising agencies should include criteria such as category consumption performance (CDI), actual purchase behavior (BDI), psycho-graphic disposition and geographic dispersion.

- Commission additional customized consumer research from multicultural and traditional research companies.

- Participate in cooperative research projects and invest in the development of shared technology and analytic capabilities.

- Publicize research findings and success stories within your organization and in the media.

Recommendations for planning and execution of integrated communications strategies

- Require training on emerging multicultural growth markets from qualified experts and on targeting these consumer groups for brand manager development, for appropriate general market agency account management and for media planning staff.

- Require a focus on emerging growth market business as a key strategy for growing total business during the planning process.

- Weigh multicultural market contributions to revenue, sales and market share — as well as their potential — in the planning and budgeting process.

- Budget adequate resources for emerging multicultural growth market efforts to fund the highest quality, effective research, planning, creative development and media buys.

Principle 2:
Generate ideas and profits by practicing inclusiveness and fairness

Recommendations for human resources diversity practices

- Establish goals and accountability systems tied to the upward mobility of people of color. Tie executive compensation to achievement of diversity goals.

- Train, retain, develop and *promote* more multicultural professionals.

- Support and participate in industry-wide recruitment, professional development and retention efforts.

- Encourage business partners, vendors and suppliers to implement multicultural recruitment and human resource development initiatives.

Recommendations for inclusive advertising and marketing planning and execution

- At the outset of the brand planning process involve all parties including multicultural agencies of record.

- Utilize the expertise of multicultural specialists. Ensure they are given the opportunity to perform the work and are compensated fairly for it.

Recommendations for implementation of fair business practices

- Identify qualified multicultural staff; ensure they are considered for advancement opportunities and ensure they are evaluated using the same criteria as non-minority colleagues.

- Provide smaller minority-owned multicultural agencies with direct opportunities to compete.

- Measure and compensate performance using the same yardsticks for minority and general market agencies, minority-formatted and general market media, minority-owned and traditional vendors.

- Ban "no urban/Spanish" dictates; hold agencies accountable.

- Mass general media companies should use moral, ethical and responsible sales tactics in competing with minority-owned and formatted media; multicultural consumers should not be disparaged or undervalued.

Principle 3:
Require accountability and measurable results

Recommendations for chief executive officer and senior executive leadership

- Commit to measurable steps and goals; monitor implementation and establish performance incentives.

- Assign senior-level line staff to be responsible; support with accountability, recognition and prestige for senior executives and other line staff.

- Participate in institutionalized mechanisms for information sharing on "no ethnic dictates" and for problem solving.

- Establish segment-specific revenue goals with corresponding incentives for growing emerging growth market business; tie these goals to growing total business.

- Communicate the commitment to these principles, practices and goals throughout the organization on a regular and continuing basis.

HEADQUARTERS
1101 VERMONT AVE., NW, STE. 500
WASHINGTON, DC 20005-6306
TELEPHONE 202.898.0089
FACSIMILE 202.898.0159
HTTP://WWW.AAF.ORG

WESTERN REGION OFFICE
SAN FRANCISCO, CA

AMERICAN ADVERTISING FEDERATION
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The AAF Lauds Executive Order Relating to Minority Procurement in Advertising Contracts

Contact: Marjorie Valin (410) 203-1228 e-mail: Mvalin@Frankandassociates.com
Heide Gardner (202) 371-2314 e-mail: Hgardner@aaf.org

WASHINGTON, DC, October 6, 2000—The American Advertising Federation applauded an executive order signed today at the White House that includes language to establish the first multicultural advertising guidelines for federal government departments and agencies.

The inclusion of an advertising section in the executive order is the result of a two-year partnership to share information among the administration, members of Congress, Vice President Gore's Interagency Working Group on Advertising, federal government agencies including the Federal Trade Commission and Federal Communications Commission and the ad industry, represented by the AAF.

"This is an historic event for the ad industry. We have a remarkable , if not unprecedented, example of top-down leadership from one of the nation's largest advertisers," said AAF President and CEO Wally Snyder. "President Clinton, as the chief executive officer of a huge client, has laid down the law with a mandate to take the diversity of the American people seriously and to widen the window of opportunity for minority contractors. This is the kind of leadership that will result from the adoption of principles for the private sector on multicultural advertising. These principles will be policy instruments to be executed at the highest levels of a company."

The principles are voluntary guidelines developed by AAF and 38 advertisers agencies and media companies to encourage greater diversity in advertising and more investment in multicultural marketing. Formally called Principles for Effective Advertising in the American Multicultural Marketplace, these guidelines have industry-wide support, including endorsements from the American Association of Advertising Agencies (AAAA), the Association of National Advertisers (ANA), the Association of Hispanic Advertising Agencies (AHAA), Association of Asian American Advertising Agencies (AAAAA), National Association of Black Owned Broadcasters (NABOB) and National Association of Hispanic Publications (NAHP).

The AAF principles lay out three general objectives for advertisers, agencies and media companies:

- Commit to identify and take advantage of growth opportunities in multicultural markets;
- Promote inclusiveness and fairness throughout the marketing and advertising process — from employment and career advancement to competition and compensation for creative services and media buys; and
- Require accountability and measurable results, including data on employment and targeted ad spending to measure the industry's pace and investment in multicultural marketing and workplace diversity.

Forty-four companies and agencies already have committed to adopting the principles, including Procter & Gamble, DaimlerChrysler, Coca-Cola, Johnson & Johnson, Verizon Communications and Kraft General Foods.

-more-

The Business Practices Review Committee was formed by the AAF and its educational foundation in January 1999 when FCC Chairman William Kennard called for an industry code of conduct in response to alleged findings of discrimination in ad rates paid to minority broadcasters. Vice President Gore also called on the industry to investigate its practices with regard to minority advertising agencies and minority-owned and formatted media.

The AAF is the advertising trade association that represents the industry in its entirety. AAF's 115 corporate members are advertisers, agencies and media companies that comprise the nation's leading brands and corporations. AAF's national network of 210 ad clubs and local ad federations are home to 50,000 advertising professionals. In addition, AAF connects industry with an academic base through its 260 college chapters.

AAF's diversity and multicultural advertising missions are implemented under the auspices of the AAF Foundation.

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1101 VERMONT AVE., NW, STE. 500
WASHINGTON, DC 20005-6506
TELEPHONE 202.898.0089
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AMERICAN ADVERTISING FEDERATION
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Wallace S. Snyder
President & Chief Executive Officer

Wally Snyder joined the American Advertising Federation in October 1985 as senior vice president, government relations. He was promoted to executive vice president, government relations in June 1990 and became president and CEO on January 1, 1992.

As president and CEO, Snyder serves as the AAF's chief spokesman. Representing nearly 50,000 members — including 115 corporate members, 210 local ad federations and 260 college chapters — Snyder often testifies before federal and state lawmakers on issues of importance to the advertising industry.

Snyder also serves the industry as a board member of several national organizations, including The Ad Council, The AAF Foundation and the National Advertising Review Council, which oversees advertising self-regulation. During his career, Snyder has written articles for several publications, including *Advertising Age, Marketing and Media Decisions, The Journal of Advertising Research, Marketing and Communications, American Advertising* magazine and *Food and Drug Reports*.

Prior to joining the AAF, Snyder was associate director for advertising practices at the Federal Trade Commission's Bureau of Consumer Protection, where he served as principal adviser to the FTC on advertising issues. Snyder also served as the FTC's liaison officer to the Food and Drug Administration and worked on a number of congressional proceedings involving the FTC.

A 16-year veteran of the FTC, Snyder joined the Commission as a trial attorney and was involved in litigation for a variety of cases. Before signing on at the FTC, Snyder spent two years as an officer in the US Army.

Snyder is a graduate of the University of Iowa, where he was elected student body president, and received his Juris Doctor degree from the University of Iowa College of Law. He is a member of the bar of the District of Columbia.

He and his wife, Jean Magnuson Snyder, have two sons and reside in Washington, D.C.

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**AAF is the Unifying Voice for Advertising. We are the advocates of the rights of advertisers. We educate policy makers, the news media, and the general public on the value that advertising brings to the well-being of the nation, and we develop the nation's present and future leaders. With headquarters in Washington and a Western region office in San Francisco, we accomplish these goals through a unique nationally coordinated grassroots network of advertisers, agencies, media companies, 115 corporate members, 210 local advertising associations and 260 college chapters.

DETERMINED TO BE AN
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2017-1120-S

AAF Principles

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Principles for Effective Advertising in the American Multicultural Marketplace

Preamble

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CAROLYN CHEEKS KILPATRICK
15TH DISTRICT, MICHIGAN
AT LARGE WHIP
COMMITTEE:
APPROPRIATIONS
SUBCOMMITTEES:
FOREIGN OPERATIONS, EXPORT FINANCING, AND RELATED PROGRAMS
TRANSPORTATION

WASHINGTON OFFICE:
503 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-2261
(FAX) (202) 225-5730

DISTRICT OFFICE:
1274 LIBRARY STREET, SUITE 1-B
DETROIT, MICHIGAN 48226
(313) 965-9004
(FAX) (313) 965-9006

Congress of the United States
House of Representatives
Washington, DC 20515–2215

White House Ceremony Concept Summary

Timed to correspond with Congressional Black Caucus weekend, on Thursday, September 14 or Friday, September 15, in an appropriate Washington setting like the White House Rose Garden

1. Presentation and formal adoption of Principles for Effective Advertising in the American Multicultural Marketplace:

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WASHINGTON OFFICE:
CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-2261
(FAX) (202) 225-5730

DISTRICT OFFICE:
1274 LIBRARY STREET, SUITE 1-B
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1. Presentation and formal adoption of Principles for Effective Advertising in the American Multicultural Marketplace:

- Estimated 50 corporation heads and representatives sign to <u>adopt</u> principles
- Government officials and trade associations sign to <u>endorse</u> principles; includes mainstream and minority trade groups

2. Announcement of House of Representatives resolution making September National Multiculturalism in Advertising Month; national rollout of Principles through AAF's national grassroots network of 50,000 members in local ad clubs and AAF College Chapters during September

- Creates an enduring and flexible framework to encourage continuing focus on diversity and multicultural advertising issues. Works for government as well as for private sector interests: Government conferences, trade association activities, corporate advertising/marketing initiatives.

- September timing corresponds with traditional scheduling of CBC Weekend and beginning of Hispanic History Month

Principles for Effective Advertising in the American Multicultural Marketplace

<u>Background on Principles and Committee Missions</u>

The principles embody the consensus of over thirty committee members who represented national advertisers, general market advertising agencies, minority-owned and focused agencies and minority -owned and focused media outlets. This Business Practices Review Committee (BPRC) worked under the auspices of the AAF Foundation and the AAF Board of Directors Multicultural Task Force. BPRC was charged with these missions:

- To identify the rationale, business and ethical paradigms that companies need to effectively promote growth, diversity and fairness in a multicultural marketplace

- To recommend practical guidelines that will help individual companies manage against those paradigms to achieve their goals

- To identify industry-wide initiatives that will be needed to support widespread adoption and successful implementation of these principles and practices

Corporate Participation on Committee

The identity of companies and their representatives has been confidential. This information will be revealed publicly during the national roll out of the Principles and Practices. A team of co-chairs represent four key industry business segments: National advertiser; general market agencies; minority advertising agencies; and minority media. They are: Procter & Gamble Global Marketing Officer Robert L. Wehling; True North Communications Chairman David Bell; The Chisholm-Mingo Group Chairman and CEO Samuel Chisholm; Spanish Broadcasting System President Raul Alarcon. Advertisers included DaimlerChrysler, Johnson & Johnson, Kraft and Kellogg's. Global ad agencies included D'Arcy, DDB Worldwide and Leo Burnett. Minority agencies included Don Coleman & Associates, La Agencia de Orci & Asociados. Minority media included BET, Essence Communications and black newspapers.

A Report Prepared by the Civil Rights Forum on Communications Policy

Civil Rights Forum on communications policy

When Being No. 1 Is Not Enough:

The Impact of Advertising Practices On Minority-Owned & Minority-Formatted Broadcast Stations

Kofi Asiedu Ofori
Principal Investigator

submitted to the
Office of Communications Business Opportunities
Federal Communications Commission
Washington, D.C.

Synopsis

As part of its mandate to identify and eliminate market entry barriers for small businesses under Section 257 of the Telecommunications Act of 1996, the Federal Communications Commission chartered this study to investigate practices in the advertising industry that pose potential barriers to competition in the broadcast marketplace. The study focuses on practices called "no Urban/Spanish dictates" (*i.e.* the practice of not advertising on stations that target programming to ethnic/racial minorities) and "minority discounts" (*i.e.* the practice of paying minority-formatted radio stations less than what is paid to general market stations with comparable audience size). The study consists of a qualitative and a quantitative analysis of these practices.

Based upon comparisons of nationwide data, the study indicates that stations that target programming to minority listeners are unable to earn as much revenue per listener as stations that air general market programming. The quantitative analysis also suggests that minority-owned radio stations earn less revenues per listener than majority broadcasters that own a comparable number of stations nationwide.

These disparities in advertising performance may be attributed to a variety of factors including economic efficiencies derived from common ownership, assessments of listener income and spending patterns, or ethnic/racial stereotypes that influence the media buying process. As a preliminary investigation, it was beyond the scope of this study to determine in quantitative terms the degree to which each of these factors may explain these disparities. Further statistical research should be undertaken to find the answer to this question. Anecdotal data collected by the study suggest that in certain instances, the media buying process is guided by ethnic/racial stereotyping, underestimations of disposable income, the desire to control product image, unfounded fears of pilferage, etc. Factors such as these form part of the basis for "no Urban/Spanish dictates"and "minority discounts" as practiced by advertisers and/or ad agencies.

As preliminary findings, the anecdotal and quantitative evidence suggests that certain practices in the advertising industry undermine marketplace competition and First Amendment principles favoring diversity of viewpoint. The study recommends further research that is sufficiently funded to fully examine these preliminary findings. The study also recommends that the federal government, based upon subsequent research and public comment, develop a policy statement on advertising practices and issue an executive order prohibiting federal agencies from contracting with ad agencies that engage in unfair or discriminatory advertising practices. With regard to the private sector, broadcasters, advertisers, and ad agencies should adopt a voluntary code of conduct that prohibits "no Urban/Spanish dictates"and "minority discounts" and that promotes a broad and diverse range of programming for all Americans.

Key words: advertising and discrimination; advertising and minorities; advertising and minority radio programming; small business competition and radio advertising.

Study Highlights

Findings:

A. An analysis based upon 1996 data for 3,745 radio stations indicated that:

- Stations that target programming to minority listeners earn less revenue per listener than stations that air general market programming.
- Minority-owned radio stations earn less revenue per listener than majority broadcasters that own a comparable number of stations nationwide.

B. Minority radio broadcasters responding to the study survey provided the following estimates of the magnitude and impact of "no Urban/Spanish dictates" and "minority discounts:"

- Ninety-one percent indicated that they had encountered "dictates" not to buy advertisements on their radio stations.
- Efforts to overcome "dictates" with market research that justifies ads on minority-formatted stations were most commonly met with no response or no recission of the dictate by advertisers or ad agencies.
- Survey respondents estimated that sixty-one percent of the advertisements purchased on their stations were discounted. The average amount of the discount was estimated to be 59 percent.
- Survey respondents estimated that "no Urban/Spanish dictates" and "minority discounts" reduce their revenues by an average of 63%.
- Forty-four percent estimated that "no Urban/Spanish dictates" and "minority discounts" interfere with their ability to raise capital and to acquire minority-formatted stations.
- Forty-four percent estimated that "no Urban/Spanish dictates" and "minority discounts," detract from the value of minority-formatted stations when they are being sold.

Conclusions:

- "No Urban/Spanish dictates" and "minority discounts" constitute barriers to competition because they detract from the amount of revenue earned per listener, and thus hinder a broadcaster's ability to attract investment capital, and to produce high quality news, information and entertainment programming in response to the needs of listeners.
- Most radio stations that air minority-formatted programming are adversely affected by advertising practices directed against minority listeners. Minority-owned stations, however, are disproportionately affected because 75% of them air programming targeted to minority listeners, compared to 8% for majority broadcasters.
- To the extent that minority formatted stations are unable to obtain advertising, their ability to serve the needs of listeners is impeded. The interest of all Americans, particularly minorities, in a broad and diverse range of informational and entertainment programming is undermined by advertising practices directed against minority consumers. Hence, "no Urban/Spanish dictates" and "minority discounts," undermine competition and detract from the First Amendment goal of diversity of viewpoint.

Recommendations:

- Subsequent research should endeavor to quantify the causal relationship between advertising practices and disparities in the advertising performance of minority-formatted and general market stations, and minority and majority-owned stations controlling for various factors such as ownership size, audience income, and market location.
- The Federal Communications Commission and the Federal Trade Commission should assemble a joint task force for the purpose of adopting a policy statement on acceptable advertising practices.
- Based upon the findings of subsequent research, the federal government should decide whether to issue an executive order that prohibits federal agencies from contracting with advertising agencies that practice "no Urban/Spanish dictates" and "minority discounts," or that otherwise fail to comply with the policy statement of the joint task force.
- The advertising and broadcast industries should adopt a code of conduct that requires buying decisions to be based upon market research and not flawed stereotypical assumptions. "No Urban/Spanish dictates" and "minority discounts" should be prohibited. Broadcasters should be required to prominently disclose whether the market research they use in conjunction with sales promotion has been prepared by a service that has been accredited by the Media Ratings Council. In instances where a non-accredited market research service is used, broadcasters should be required by the FCC to show cause why they do not use a service that is currently accredited by the Media Ratings Council.

Comparison of Minority and Major Broadcasters by Format

(All figures are averages. Currency in thousands)

(Number of Stations)	'96 Nat Rev	# Nat. Stat.	'96 Stat. Rev.	Power Ratio
General Formats	$129,059	42.5	$2,202	1.16
Majority Owned - All (3293)	$130,497	43	$2,214	1.16
Majority Owned - Small (2,288)	$13,040	7.4	$1,410	1.16
Minority Owned - All (39)	$7,630	7.4	$1,237	0.85
Minority Targeted Formats	$86,125	26.3	$1,958	0.91
Majority Owned - All (297)	$116,574	34.8	$2,052	0.95
Majority Owned - Small (193)	$7,387	4.9	$1,038	0.99
Minority Owned - All (116)	$8,164	4.4	$1,717	0.82

Source: **"When Being No. 1 Is Not Enough:** The Impact of Advertising Practices On Minority-Owned & Minority-Formatted Broadcast Stations." (page 79)
Civil Rights Forum on Communications Policy.