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United States Department of State
and the Broadcasting Board of Governors
Office of Inspector General

Report of Inspection

Alhurra's Programming Policies and Procedures

Report Number ISP-IB-08-45, May 2008

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and the Broadcasting Board of Governors

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PREFACE

This report was prepared by the Office of Inspector General (OIG) pursuant to the Inspector General Act of 1978, as amended, Section 209 of the Foreign Service Act of 1980, the Arms Control and Disarmament Amendments Act of 1987, and the Department of State and Related Agencies Appropriations Act, FY 1996. It is one of a series of audit, inspection, investigative, and special reports prepared by OIG periodically as part of its oversight responsibility with respect to the Department of State and the Broadcasting Board of Governors to identify and prevent fraud, waste, abuse, and mismanagement.

This report is the result of an assessment of the strengths and weaknesses of the office, post, or function under review. It is based on interviews with employees and officials of relevant agencies and institutions, direct observation, and a review of applicable documents.

The recommendations therein have been developed on the basis of the best knowledge available to the OIG, and have been discussed in draft with those responsible for implementation. It is my hope that these recommendations will result in more effective, efficient, and/or economical operations.

I express my appreciation to all of those who contributed to the preparation of this report.

A handwritten signature in black ink, appearing to read "Bill Todd", written in a cursive style.

William E. Todd
Acting Inspector General

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KEY JUDGMENTS

- The Middle East Broadcasting Networks, Inc. (MBN) is a nonprofit grantee of the Broadcasting Board of Governors (BBG) that operates Alhurra Television and Radio Sawa. In December 2006 and early 2007, Alhurra's adherence to the broadcasting standards and principles of the U.S. International Broadcasting Act was questioned. In the past year, Alhurra has taken significant steps to tighten its procedures and policies in order to protect the credibility that is critical to fulfilling its mission.
- Alhurra updated its 2005 Journalistic Code of Ethics in May 2007, adding a section entitled "Controversial/Sensitive Issues," which explicitly states that MBN will not broadcast live speeches or interviews with persons designated as terrorists unless the broadcast has been previously approved by the vice president for news or his or her designee.
- New management controls over programming include close supervision by Alhurra's Arabic-speaking vice president for network news. Three daily editorial meetings are used to discuss the rundown for the news and plans for programming. An assignments desk coordinates and controls what goes on the air. The person filling the new position of director of program review and research monitors Alhurra programming and its competition. The director, an Arabic speaker who reports directly to MBN's president, has submitted plans for an in-house program review function.
- Alhurra has put into place a journalistic training program with instruction provided by experts from the University of Missouri's School of Journalism and the George Washington University School of Public Affairs. It has also scheduled follow-up training.
- Four initiatives are still in the works. Alhurra expects to start streaming original programming from its Web site in the next few weeks. MBN has ordered the equipment required for archiving programming and expects a fully operational Web site shortly after streaming commences. A BBG contractor is working on translating randomly selected programs and posting them on the BBG Web site. The BBG expects this program to increase sharply in the

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weeks ahead to produce a significantly higher number of hours of translation for Alhurra in fulfillment of Congressional intent as expressed in the FY 2008 Consolidated Appropriations Act. BBG has contracted with the University of Southern California Annenberg School for Communication to evaluate Alhurra's adherence to its journalistic principles. Results are expected by the end of June 2008.

The review took place in Washington, DC, between February 20 and March 31, 2008. Martha Goode conducted the review. OIG obtained information from BBG, the International Broadcasting Bureau, MBN, and the Department of State (Department) through interviews and document reviews.

CONTEXT

Background of Middle East Broadcasting Networks

MBN, comprising Alhurra Television and Radio Sawa, is a private, nonprofit corporation created to provide objective and balanced news and information to the people of the Middle East about their region, the world, and the United States.¹ It is supervised by the BBG, an independent federal agency that oversees all U.S. Government-supported, nonmilitary international broadcasting, including the Voice of America (VOA) and the Office of Cuba Broadcasting (Radio and TV Marti), Radio Free Europe/Radio Liberty (RFE/RL), and Radio Free Asia. MBN, RFE/RL, and Radio Free Asia operate as grantees funded by the U.S. Government.

MBN, according to BBG's Web site, works to broaden the range of perspectives and exchange of ideas on issues of significance to the lives and future of its audience and to provide objective, accurate information about America, American policies, and Americans. It operates three 24/7 Arabic-language news and information television channels – Alhurra (Arabic for “The Free One”), Alhurra-Iraq, and Alhurra Europe – as well as Radio Sawa. MBN broadcasts reach an estimated 35 million people each week. It is solely funded by the U.S. Government through a grant agreement. Its FY 2008 budget is approximately \$103 million, which includes \$10 million from an emergency supplemental appropriation.

The regional Alhurra channel was launched in February 2004 to provide a reliable source of objective news and information to the entire Middle East region. Alhurra also has a special Iraq stream that launched in April 2004. In August 2006, Alhurra launched a third network, targeting Arabic speakers in Europe.

¹MBN was created pursuant to the Emergency Wartime Supplemental Appropriations Act, 2003 (P.L. 108-11) when the Congress appropriated initial funding “for activities related to the Middle East Television Network broadcasting to the Middle East and radio broadcasting to Iraq.”

Congressional Request

In House Report 110-197 (H.R. Rep. No. 110-147, at 17 (2007)) for the State, Foreign Operations, and Related Programs Appropriations Bill, 2008, the Committee on Appropriations requested that the Office of Inspector General (OIG) review the current programming policies and procedures at Alhurra, particularly its policies involving terrorists or those who support them. Congress's concern dates back to at least December 2006, when certain programs were aired on Alhurra that did not appear to some to follow the editorial principles stated in the U.S. International Broadcasting Act of 1994.² Specifically, the House Report asked for a review of the editorial policy in place in 2006 and 2007 regarding broadcasts involving terrorists or those who support them; whether any changes were made to that policy or the Alhurra's journalistic code during the period; who was responsible for enforcing the policy; what action, if any, was taken against those who violated the policy; what management changes have been made to ensure the policy and journalistic code is monitored and enforced; and whether there are clear lines of authority at Alhurra to provide for accountability of journalistic decisions.

In the subsequent explanatory statement³ of the Committee on Appropriations to the Consolidated Appropriations Act, 2008 (P.L. 110-161), dated December 27, 2007, this language did not appear. However, the House subcommittee asked OIG to prepare a report discussing actions taken by Alhurra to strengthen its procedures and policies. The report was to include how MBN had progressed in carrying out the directives in House Report 110-197 regarding 24/7 streaming, archiving on Alhurra's Web site of all original programs, and the random translation of Alhurra's original programming by an independent entity.

Situation in December 2006 and Early 2007

In December 2006 through early spring 2007, certain allegations came to light through the press and other sources stating some Alhurra reports did not live up to its journalistic code and were not appropriate, objective, or accurate. Among those was a speech on December 7, 2006, by Hezbollah leader Hassan Nasrallah that aired for slightly over an hour and without contextual comment. Alhurra explained its coverage strategy was to carry the speech for a few minutes to acknowledge to viewers that it was taking place. However, because of miscommunication with the producer, the speech went on too long before it was dropped.

²22 U.S.C. § 6201 et seq.

³Printed in the *Congressional Record*, December 17, 2007.

Another criticized piece was a short segment (two and one-half minutes) on December 11, 2006, by a reporter covering the conference on denial of the Holocaust in Tehran. Alhurra's management agreed the reporter had not followed MBN's journalistic code and did not put the issue in appropriate context to reflect the meaning of the conference objectively. Alhurra pointed out its other coverage of the Holocaust and coverage in general followed the journalistic code.

Those broadcasts and some others provoked questions of the journalistic capability of the organization. The articles in newspapers and blogs were both accurate and inaccurate, according to one BBG official. They made Alhurra a very public phenomenon. There was evidence, acknowledged by MBN, that some broadcasts were not up to MBN's journalistic standards. Some problems came about because of inexperienced journalists. MBN readily admitted when problems were discovered and informed its board of directors.

May 16, 2007, Hearing

On May 16, 2007, the House Committee on Foreign Affairs Subcommittee on the Middle East and South Asia held a hearing entitled, "Public Diplomacy in the Middle East and South Asia: Is the Message Getting Through?" One panel was composed of BBG Governors Joaquin F. Blaya and D. Jeffrey Hirschberg. Discussions and questions for this panel focused on Alhurra's recent controversial media coverage. Halfway through the panel, MBN President Brian Conniff, who took office in June 2006, was asked to join the Board members to answer specific questions. The committee wanted assurances Alhurra had initiated better journalistic internal controls.

Mr. Conniff stated that, until recently, there had been no formal Alhurra assignments desk to decide on a day's lineup and to coordinate coverage. Governor Blaya detailed the changes Alhurra management had made or planned in order to ensure such problems did not recur. His written testimony stated:

We acknowledge Alhurra's error during this period in airing several reports that lacked journalistic or academic merit. These were a very small fraction of the networks' broadcasting output, but nevertheless are unacceptable.⁴

⁴Testimony of Joaquin Blaya, Broadcasting Board of Governors, before the Subcommittee on the Middle East and South Asia Committee on Foreign Affairs, May 16, 2007, p. 11.

Department of State Certification

In order for funds appropriated for Alhurra programs and activities in FY 2008 to be available, the Secretary of State was required to certify and report to the Committees on Appropriations that Alhurra does not advocate on behalf of any organization that the Secretary knows, or has reason to believe, engages in terrorist activities.⁵ On February 4, 2008, the Department's Deputy Secretary of State John D. Negroponte certified the above in writing, along with a memorandum of justification, to the Chairs and Ranking Members of the House and Senate Committees on Appropriations and the Chairs and Ranking Members of the State, Foreign Operations and Related Program Subcommittees.⁶

In the four-page memorandum, the Department described Alhurra's role as "a vital voice for reason in a turbulent region," providing news on highly sensitive and hotly debated issues. The explanation continued:

As such, it will not be possible for it to provide independent news coverage without mention of terrorism and its consequences. Such coverage does not amount to advocacy for such groups and serves to provide information in accordance with professional journalistic standards in an area of the world where such professionalism is often sadly lacking.⁷

⁵P.L. 110-161, Division J, section 114.

⁶Pursuant to Department of State Delegation of Authority 245.

⁷Department of State, "Certification Concerning Alhurra Television Pursuant to Section 114 of the Department of State, Foreign Operations, and Related Programs Appropriations Act," dated February 1, 2008, Memorandum of Justification, pp. 2-3.

CURRENT POLICIES AND PROCEDURES

OIG reviewed the changes Alhurra had made in its procedures over the last year in response to Congressional interest. It studied the journalistic code of ethics that was in place in December 2006 and whether it was adequate to ensure terrorists not have uncensored access to Alhurra's airwaves. OIG also reviewed other managerial changes initiated by Alhurra during the year, including stricter editorial management procedures, the evolution of the assignments desk, a new position for independent monitoring of Alhurra programs by an Arabic speaker, and a robust training program. Finally, OIG determined the current status of Alhurra's streaming, translation, and independent evaluation projects.

Journalistic Code of Ethics

All of the BBG broadcasting entities, including MBN, operate under the BBG's standards and principles set out in the U.S. International Broadcasting Act of 1994, Section 303.⁸ Included in the Act is also the Voice of America Charter (Section 303 (c)). In addition, each entity crafts its own journalistic code of ethics, drawn from the principles in the Act. BBG management noted the codes of MBN and RFE/RL were similar, with the same language about treatment of terrorist voices. The Board provides further policy guidance to entity managers as specific situations arise.

In December 2006, MBN operated under its Journalistic Code of Ethics dated March 2005. At least two of the code's 20 bulleted points specifically covered principles relevant to MBN's December 2006 coverage:

- Broadcasts shall not contain material which could be construed as an incitement to violence. Programming on disturbances or other tense situations must be balanced and factual. Alhurra will not permit its programs to be used as a platform for terrorist organizations.
- All broadcasts should contain sufficient background information and explanation to enable the audience to better understand the significance and con-

⁸BBG Fiscal Year 2009 Budget Request, p. 1; 22 U.S.C. § 6201 et seq.

sequences of information being reported. Journalists shall not insert their personal opinions or judgments in factual reports at any time.

In May 2007, MBN issued its Revised Journalistic Code of Ethics. There were slight stylistic changes and two new sections. One addressed plagiarism and the other, entitled “Controversial/Sensitive Issues,” elaborated on the earlier policy (see Appendix A for the May 2007 Revised Journalistic Code of Ethics):

MBN does not provide an open platform for terrorists or those who support them. This has long been the policy of all United States international broadcasting organizations and grantees, and MBN fully complies with this policy. MBN will not broadcast live speeches or interviews with persons designated as terrorists unless the broadcast has been previously approved by the vice president for news, or his or her designee. When the broadcast will be on the radio, the Radio Sawa news director should be consulted.

Senior Management Controls

MBN reports that the current vice president for network news, an Arabic speaker, has helped to strengthen internal journalistic controls. He began June 11, 2007, when the previous director for news resigned, under pressure from Congress, after about seven months. The vice president for network news and MBN management told OIG he exercises tight control over what goes on the air. For there to be any live coverage, it must be cleared by him or his designee in advance. Alhurra is on the air 24 hours a day and staffs the newsroom for 18 of those hours. The news director is available 24/7 to respond to questions and problems.

In addition, there are now three editorial meetings each day. A morning meeting is used to discuss the rundown of news for the day’s newscasts. At mid-day, there is a meeting for the Iraqi stream for the next day. During an editorial meeting in the afternoon, senior producers decide on work for the next day, the week, the month, and special events.

The vice president for network news monitors programming on Alhurra and listens to the audio on his phone. He approves all guests from the region. Among other things, he monitors the language used because, as he says, “Arabic is a rich language, and Alhurra needs to be consistent in the way it uses terms.”

OIG expressed concern that there was no alternate for the vice president. The vice president said he is available 24 hours a day and plans to delegate some of his responsibilities later. There may also be a deputy chief editor in the future. He

stated that mistakes occur as in any fast-paced news organization. Some are due to journalistic weaknesses that experience and training will help. OIG made an informal recommendation on this topic.

Assignments Desk

In December 2006, Alhurra did not have a fully operational assignments desk, although the functions were carried out by separate individuals. Between December 2006 and March 2007, Alhurra gradually brought together this function that is critical for a journalistic organization. The assignments desk staff, which has three people and is awaiting a fourth, sit around a desk and function as a team. Previously, Alhurra did not require scripts of what was proposed for airing, and a project could go directly to a senior producer without review. The desk reviews scripts and then “packages” containing all the parts for a program and reports to the vice president for network news. In the past, there were occasional breakdowns in the editorial chain. MBN’s management said now the assignment desk can coordinate and control what goes on the air.

Internal Monitoring

After the December 2006 problems came to light, MBN’s president appointed an experienced Arabic speaker, who had been with Alhurra since it began, to become director of program review and research. The newly created position started in early February 2007. The director monitors programming continuously and reports directly to the MBN president to keep him apprised independently of Alhurra’s programming and any problems he detects.

The director’s position description includes the following: “Perform a regular spot check of Alhurra programming and compare coverage with main competitors (Al Arabiya and Al Jazeera). Provide a weekly report of analysis; provide special focus on competitor coverage when Alhurra is airing breaking news of live news coverage.” He brings to the president’s attention whether Alhurra is leading coverage or is missing key coverage carried by the other competitors. The position has authority to address the vice president of network news immediately if there is an urgent problem that needs correcting.

The position is also responsible for internal program reviews and evaluations. The director is in the process of starting an internal review program and has submitted a plan for FY 2009. He has conferred with RFE/RL and Radio Free Asia on the

subject as well as with IBB's Office of Performance Review. In addition, the director reviews internal pilots on DVDs. He said he uses his experience in management, finance, strategic planning, and journalism to advise the MBN president on these pilots.

Training

BBG Governor Blaya told Congress in May 2007 that a training plan for Alhurra that would enhance the skills of its employees and the quality of its programming was underway and would be implemented by the end of the fiscal year. Alhurra contracted for journalistic training to be provided by three professors from the University of Missouri's School of Journalism. The team presented two 90-minute presentations in September 2007. MBN's president introduced each session and rearticulated MBN's mission to present news in a clear, unbiased manner. The first session was the theory of good journalism – how fair, balanced, and accurate news serves the public and society. Later, attendees analyzed MBN stories. The class lasted three and a half days, with three sessions each day. The whole newsroom attended the class, except those who were on leave.

MBN contracted with George Washington University's School of Public Affairs to do a three-part series on political institutions and election coverage. Two sessions were held in late December or early January 2008 before the Iowa caucuses. The first part was on election coverage. A second session focused on U.S. political institutions, including the election process and the Constitution. A third session held in February 2008 was about covering campaigns and how to understand the impact on the Middle East of U.S. election results.

Training has been well-received, and MBN sees it as a continuing process. MBN is planning more training by the University of Missouri geared toward maintaining credibility. The challenge is to make future training meaningful for all levels of journalists. Alhurra employees hail from many different countries throughout the Middle East with varying standards of journalism. The purpose of the training is to ensure a consistency of standards for all broadcasts.

Internet Streaming and Archiving

The Committee on Appropriations' explanatory statement on H.R. 2764 (P.L. 110-161) includes the directives from the House Report 110-197 regarding 24/7 streaming and archiving on Alhurra's Web site of all original programs. MBN's director of information technology said he was building the streaming system on MBN's current Web site. (A new site is under construction, but he did not want to

wait until it was completed before beginning the streaming.) Alhurra is to stream its own original programming from the 24 hours that it is on the air. This amounts to about eight to 10 hours of original programming, once replays and nonoriginal programming are subtracted. IBB has assisted with the project, and MBN is currently using IBB's infrastructure for testing.

Translations on Web

The congressional conference report mentioned above also provided for the random translation of up to 16 hours per week of Alhurra's original programming by an independent entity. Such translations would be posted to the Internet and would provide a tool for transparency. A similar translation program run by a contractor has been in place for VOA Persian television since May 2007 and for Arabic translations since November 2007. The project uses random selection software to choose the programs to be translated.

The system worked well until the end of FY 2007, when continuing resolutions went into effect. This slowed down the program. From September 30, 2007, until the end of February 2008, BBG submitted both Persian and Arabic programs for translation. Translations for this body of programming have experienced delays related to funding and are being posted as they are completed.

On February 28, 2008, IBB prepared a new statement of work on program translation pursuant to the directive in the Appropriation bill. IBB was preparing to enter into a new series of translations for Alhurra, Radio Sawa, VOA Persian television, VOA Persian radio, and Radio Farda. The period of performance is from March 3, 2008, through September 30, 2008. Those translations would be posted on the BBG Web site (see Appendix B for location of Persian translations). Industry professional translators estimate that one hour of radio takes 38 hours for translation. One hour of television takes 47.5 hours for translation.

Independent Outside Evaluation

Governor Blaya testified before Congress in May 2007 that MBN would contract for an objective, independent review of Alhurra programming to examine its journalistic integrity and adherence to the standards and principles of the U.S. International Broadcasting Act. IBB's Office of Contracts went through a long process to select a contractor. Eventually, IBB selected the University of Southern California, Annenberg School for Communication. The contract was signed at the end of September 2007. The period of performance is through June 30, 2008. The terms of

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the contract call for an assessment of “Alhurra TV news and current affairs broadcasts to determine whether these broadcasts conform to the standards and principles set forth in the Act, and more specifically, with MBN’s Journalistic Code.” BBG and the contractor created the evaluation process. The statement-of-work criteria requires a blind process of selection of MBN programming. It forwarded more than 200 hours of programming to the contractor, and work has begun.

The contractor has provided one progress report to BBG already. The next is due at the end of March 2008, and the final report is due at the end of June 2008. BBG and the contractor have had a number of conversations about methodology for the evaluation and recently came to an agreement on criteria. BBG’s representative stated that the Board treats the matter of quality control seriously. He estimated he had worked on this project about once or twice a week since November 2007.

CONCLUSION

Recent Audience Research

As of February 20, 2008, international audience research prepared for BBG indicated the estimated audience for Alhurra is 23 million weekly viewers, a two million person increase over last year. At the top of the scale was Al Jazeera at 74 million weekly viewers. At the lower end of the scale were CNN with four million viewers, BBC World News at three million, and Deutsche Welle with 0.3 million. In the nine Middle Eastern countries polled, Alhurra's ratings for being "very" or "somewhat" trustworthy were 90 percent or above in three countries and between 83 and 89 percent in four countries. The two countries with the lowest percentages were Saudi Arabia with 76 percent and Iraq with 48 percent.⁹

Preserving Credibility

All BBG and MBN officials stress that their most precious commodity is broadcast credibility and program excellence. Governor Blaya testified that, "Credibility is key to success in broadcasting, and it is our greatest asset. If our audiences do not find our broadcasts to be credible, they will tune us out. If they tune us out, we sacrifice our mission."¹⁰ MBN during the past year has put into place more vigorous policies, procedures, training, and tools for transparency in order to preserve its credibility. Some plans are still in the works. It knows it must remain diligent.

⁹BBG PowerPoint presentation to Congress entitled "Radio Sawa and Alhurra TV: Performance Update," February 20, 2008.

¹⁰Testimony of Joaquin Blaya, Broadcasting Board of Governors, Before the Subcommittee on the Middle East and South Asia Committee on Foreign Affairs, May 16, 2007.

INFORMAL RECOMMENDATION

The positions of MBN vice president for network news and director of program review and research are important to maintaining internal controls over programming quality and adherence to the MBN Journalist Code of Ethics. However, neither of the two positions has a backup or provisions for what would happen in their absence.

Informal Recommendation 1: The Middle East Broadcasting Networks should make plans for delegations of duty for the vice president of network news and the director of program review and research.

MIDDLE EAST BROADCASTING NETWORK
PRINCIPAL OFFICIALS

	Name	Arrival Date
President	Brian Conniff	06/06
Chief of Staff	Kelley Sullivan	08/06
Vice President for Network News (five years as Radio Sawa News Director)	Daniel Nassif	06/07
General Counsel	Anne Noble	05/04
Director of Program Review & Research (with Alhurra since 2004 in other positions)	Vatche Sarkisian	02/07

ABBREVIATIONS

BBG	Broadcasting Board of Governors
Department	U.S. Department of State
IBB	International Broadcasting Bureau
MBN	Middle East Broadcasting Networks
OIG	Office of Inspector General
RFE/RL	Radio Free Europe/Radio Liberty
VOA	The Voice of America

APPENDIX A

MIDDLE EAST BROADCASTING NETWORKS REVISED JOURNALISTIC CODE OF ETHICS (MAY 2007)

JOURNALISTIC CODE OF ETHICS

MBN's mission is to broadcast news which is consistently accurate, authoritative, objective, balanced and comprehensive. MBN strives to serve as a model of the free marketplace of ideas and a free press in the American tradition, promoting freedom, democracy and human rights, including freedom of religion. Additionally, MBN has a mandate to present the policies of the United States government in a clear and effective manner through news reporting and responsible discussion.

ACCURACY

MBN journalists shall do their utmost to ensure that all broadcasts are factually accurate. Where doubt or controversy exists on significant points of fact, information must be based on at least two independent sources. No program material shall be broadcast that is based on rumor or unsubstantiated information.

Any documents, video or audio obtained from outside sources must be properly authenticated.

Factual errors will be corrected on-air as soon as possible.

IMPARTIALITY

Information shall be reported or discussed in a factual, objective context that enhances understanding of the events and issues and provides clarity without distortion or bias. Objective language shall be used to reflect events and issues accurately and dispassionately. Broadcasters shall present opposing or differing views accurately and in a balanced manner on all issues. When groups or individuals whose views are important for balanced programming decline to comment, it is appropriate to note this on the air.

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MBN shall be independent from any political party, ruling or opposition group or organization, émigré organization, commercial or other special-interest organization, or religious body, whether inside or outside the broadcast area; and shall not endorse or advocate any specific political, economic, or religious viewpoint.

CONTROVERSIAL/SENSITIVE ISSUES

MBN does not provide an open platform for terrorists or those who support them. This has long been the policy of all United States international broadcasting organizations and grantees, and MBN fully complies with this policy. MBN will not broadcast live speeches or interviews with persons designated as terrorists unless the broadcast has been previously approved by the vice president for News, or his or her designee. When the broadcast will be on the radio, the Radio Sawa news director should be consulted.

ANALYSIS, COMMENTARY AND EDITORIALS

All broadcasts should contain sufficient background information and explanation to enable the audience to better understand the significance and consequences of information being reported.

Journalists shall not insert their personal opinions or judgments in factual reports at any time.

Failure to abide by this policy constitutes grounds for termination of employment.

Material that is primarily analytical will be clearly labeled as such, to distinguish it from factual news reporting and commentary.

* *Analysis* provides background information, explanation, and differing authoritative views on an issue or event—but states no personal opinion on the part of the speaker. Analysis is preferred over commentary.

* *Commentary*, which is to be clearly labeled as such, is analytical in content and judicious in tone but reflects the personal judgment or opinion of the speaker on a particular issue.

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TONE OF MODERATION AND RESPECT

Broadcasts, including talk shows and debates, shall at all times maintain a calm and professional tone and shall project a model of civilized, reasoned discourse, as well as respect for the human rights of all persons. Broadcasters and guests shall not make religious, ethnic, socio-economic or cultural slurs upon any person or groups and shall observe common standards of etiquette and taste.

Broadcasts shall not contain material which could be construed as an incitement to violence.

Programming on disturbances or other tense situations must be balanced and factual. MBN will not permit its programs to be used as a platform for terrorist organizations.

AVOIDANCE OF ADVOCACY

MBN supports freedom, democracy and the human rights common to democratic states. However, MBN does not advocate the adoption of specific policies or legislation, or endorse or oppose candidates for elected or appointed office.

ETHICAL CONDUCT

MBN staff members and contributors shall maintain the highest ethical standards in all conduct, taking particular care to avoid any conflict of interest, or the appearance thereof, in their relations with individuals, groups and/or political or commercial interests inside or outside the broadcast area. MBN staff members and contributors shall remain free of associations and activities that could, or could appear to, compromise their integrity, damage their credibility or jeopardize their journalistic independence. They shall refuse gifts, favors, fees, free travel and special treatment, and shun secondary employment, political involvement, public office and service in community organizations to the extent any of these could compromise journalistic integrity. MBN staff members and contributors shall in no way abuse their status as public Figures, or the good reputation of MBN, to promote personal interest or gain.

In keeping with this policy, MBN employees are not permitted: (a) to appear on radio or television programs, in print, or in commercial advertising under their own names or pseudonyms; (b) to write (under their own names or pseudonyms) for publication (electronic or otherwise) on any topic; or (c) to serve in an advisory capacity for any media organization or political or advocacy group without the express written prior permission of the vice president for News.

INTERVIEWS

Interviews must be unrehearsed and specific questions must not be submitted in advance. It is permissible to discuss in advance with the interviewee the purpose of the interview and the general subjects to be covered. All recorded interviews are subject to editing and no MBN staff member or contractor may represent to anyone that an interview will be carried in full. The raw or edited film, tape, other electronic version of the interview or transcript may not be shown to or played for an interviewee or representative in advance of its broadcast, nor may the interviewee or a representative participate in the editing of the interview.

EDITING AND PRODUCTION STANDARDS

All persons who edit reports, interviews and other materials for air shall ensure that their editing reflects fairly, honestly and without distortion what was seen and heard by MBN reporters and recorded by our cameras and microphones.

Page 26 Employee Handbook

Interviews are to be edited in a straightforward manner, preserving, even in short sound bites, the sense of the interview. Answers may not be taken out of context or edited together in a manner to change their meaning. The narration leading to a sound bite must reflect the question that elicited the response.

PLAGIARISM

When a journalist at MBN uses facts gathered by any other organization, those facts must be attributed. This policy applies to material from newspapers, magazines, books, CDs and broadcasts, as well as to material taken from news agencies like Reuters, Agence France Presse and the Associated Press (for example, “the Secretary told Reuters”). In other words, even when we purchase news services, we do not treat the reporting done by others as reporting done by us. MBN’s preference, when time and distance permit, is to do our own reporting and verify another organization’s story; in that case, the reporter, correspondent or anchor need not attribute the facts. But even then, as a matter of courtesy and candor, the reporter, correspondent or anchor should credit an exclusive to the organization that first broke the news (for example, “CBS reported this morning ...”). Attribution to another news organization, however, does not mean MBN’s journalists can broadcast rumors or allegations that would not independently meet the test of MBN’s own reporting standards, as set forth in this policy. Rumors and allegations must satisfy MBN’s standard of newsworthiness, taste and plausibility before being broadcast, even when attributed. And when the need arises to attribute, that is a good cue to consult with a senior producer

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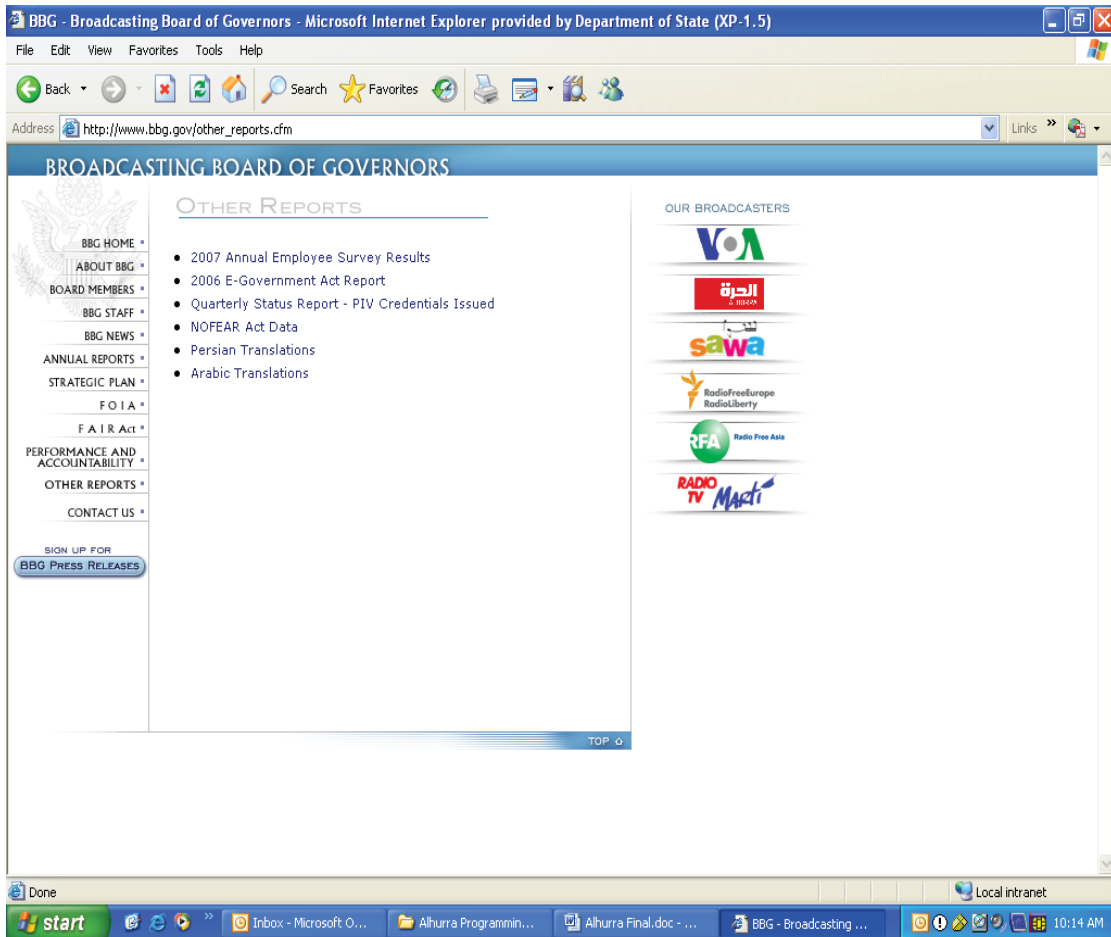
or editor about whether broadcast is warranted at all. Thus, MBN would not permit the broadcast of a statement like this – “One Commissioner apparently accused another Commissioner of lying about the grain statistics, according to the Associated Press” – unless MBN had independently confirmed, in accordance with this policy, that “One Commissioner accused another Commissioner of lying about the grain statistics,” in which case attribution would not be necessary.

In cases when it makes a difference whether MBN staffers or stringers directly witnessed a scene, MBN should distinguish on air between personal interviews and telephone or E-mail interviews, as well as written statements. [This policy was adapted from the plagiarism policy of *The New York Times*, which is available online at <http://www.asne.org/index.cfm?id=408>.]

APPENDIX B

BBG WEB SITE FOR PERSIAN TRANSLATIONS
WWW.BBG.GOV/OTHER_REPORTS.CFM

OIG Note: At the time of this report, no Arabic translations had been posted to the Web. This page view illustrates where Arabic translations may be posted in the future. They may also be posted on the Alhurra Web site.



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