

But television can bring the same kind of material to the attention of the mass audience. The respected quarterly, *Foreign Affairs*, has a circulation of about 60,000. So an article on Africa appearing in it can attract only a limited audience.

While some in that audience doubtless watched ABC's 4-hour documentary on Africa last September, millions of others who do not read *Foreign Affairs* had the opportunity for an in-depth exposure on this subject. ABC's "Africa" had an audience of 40 million people.

Having made all these comparisons between broadcasting and the other media, I would now like to look more closely at the crucial one I mentioned earlier—Broadcasting alone operates under the FCC fairness doctrine which requires the presentation in news and documentary programs of varying points of view on controversial public issues.

While ABC has never advocated the entire withdrawal of the fairness doctrine, I do think we ought to recognize that the existence of the doctrine raises a number of interesting questions. I would simply like to pinpoint some of those questions as food for thought without attempting to answer them in this statement. I think this committee will and should go into these questions much more fully in the course of its panel discussions.

The first question—and I think the most important—is whether the doctrine violates the first amendment to the Constitution.

There is no question that it imposes on broadcast journalists a limitation that does not apply to their colleagues in the print media—the requirement that broadcasters present points of view that they might otherwise choose not to on journalistic grounds. Is this an abridgement of freedom of the press? Or, on the other hand, is it a vital, legitimate way of assuring that the broadcaster will not use his control over one of the limited number of public airways to promote private, partisan policies?

Secondly, since broadcast content in this sense is now regulated by the Government, may this not raise in some broadcasters—rightly or wrongly—the fear that if they present material unsympathetic to whatever administration is in power they may face the threat of reprisal from their regulator?

Thirdly, does the requirement for an overall treatment of controversial issues make for a wishy-washy, on-the-fence quality in broadcast journalism that stifles its ability for hard-hitting investigatory reporting?

The fourth question I raise deals with the subject of comment and opinion. Traditionally, the print media provide opportunity for the most forthright expression of all kinds of opinions. Journals such as the *New Republic* on the left, and *National Review* on the right are devoted to the development of particular points of view.

Local stations, like magazines and newspapers, can present their opinions. But broadcast editorials, unlike those in print, must by regulation allow for the presentation of responsible opposing viewpoints. And there is the separate consideration that no opinions are expressed by the national networks. Does this situation also detract from broadcast journalism's role in contributing to the discussion of vital issues?

Finally, what about the limitations imposed on broadcasters by section 315 of the Communications Act? Does its existence discourage op-