



# BACKGROUND PAPERS

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## **S H O U T I N G T O B E H E A R D**

Public  
Service  
Advertising  
in a  
New  
Media  
Age

# PUBLIC SERVICE ADVERTISING IN AMERICA

## An Overview

By Warren Berger

These are turbulent times in public service advertising. More groups than ever are competing for a limited amount of airtime for their messages. There are ongoing debates about whether broadcasters are donating enough time to public service advertisements (PSAs) and questions being raised about whether sponsors of public education campaigns are sufficiently adapting to the times. In fact, even what seems like the simplest of questions – what is a PSA? – no longer has an easy answer. Is a PSA still a PSA if it promotes a broadcaster's programming or a corporation's interest? Is it a PSA if it has been paid for?

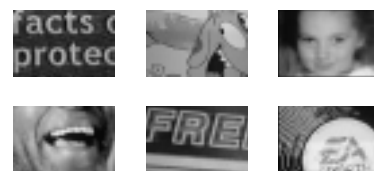
In the midst of all these changes, a seminal event took place in 1998, when the White House's Office of National Drug Control Policy (ONDCP) decided to pay \$1 billion for five years worth of antidrug ads. It seemed the government was making this unprecedented expenditure because it believed that advertising could play a role in helping to change the attitudes and behaviors of young people. But some, including then-chair of the Federal Communications Commission, Reed Hundt, saw darker clouds on the horizon.<sup>1</sup>

At the time, Hundt expressed concern that this move by the ONDCP was another indication that the traditional public service model – which has long relied on donated airtime from broadcasters seeking to fulfill their public service obligations – was no longer working. "I would consider it a white flag of surrender," says Hundt, when reflecting on these events three years later. "The fact that the government is willing to pay this much for airtime means they are simply not willing to demand that the networks donate time." The National Association of

Broadcasters (NAB) and the Advertising Council (or the Ad Council, as it is often referred), one of the leading sponsors of public service campaigns, have done studies concluding that the networks are meeting their public interest obligations by making consistent and generous contributions to public service, including PSAs.<sup>2</sup>

A new study by the Kaiser Family Foundation examines the amount of airtime currently donated to PSAs and finds that broadcast and cable networks provide an average of 15 seconds every hour to public service advertising (just under one half of 1 percent of all television airtime). In addition to these donated minutes, the study also finds that sponsors such as the ONDCP are buying about nine seconds an hour for their public service messages – about a third of all PSAs.<sup>3</sup>

It's hard to know how these new trends – and the debates they've sparked – would have looked to the first pioneers of public service advertising 60 years ago. In the United States, this new form of advertising began to gain momentum in the early 1940s, after advertising industry leader James Webb Young, a consultant to the ad agency J. Walter Thompson, suggested that advertisers could improve their public image by designing ads for good causes and providing public education on important issues of the day. Young challenged his colleagues to use their persuasion skills "to confound the critics of advertising with the greatest demonstration of advertising's power they have ever seen."<sup>4</sup>



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#### Edited by

Laura Schiller and Tina Hoff.

These papers are available on the Kaiser Family Foundation's Web site at [www.kff.org](http://www.kff.org).

The Kaiser Family Foundation is an independent, national health philanthropy dedicated to providing information and analysis on health issues to policymakers, the media, and the general public. The Foundation is not associated with Kaiser Permanente or Kaiser Industries.

The ad industry soon had an opportunity to put Young's plan into action. The onset of World War II led to the formation of the Ad Council, which created ads serving the war effort by explaining food rationing, urging people to conserve, and so forth. Some of the Council's more famous World War II ads became classics: "Loose lips sink ships" was one example of pithy Madison Avenue sloganeering brought to the cause.

After the war, the Ad Council soon expanded into many other areas of society, and, by the late 1940s, began working closely with various government agencies and charities. It was during this period that one of public service advertising's most famous characters, Smokey Bear, came to life, educating the public about the dangers of forest fires. Smokey's success suggested that some of the same tools that had been used to sell products – cartoon characters, catchy phrases, emotional appeals – could be used for matters of grave importance.<sup>5</sup>

But while the Ad Council lent its advertising expertise and creative services to various causes and advocacy groups, the growth of PSAs also depended on another important element – the availability of broadcast airtime to run the messages. Part of the Ad Council's role was to approach broadcasters and persuade them to fill gaps and holes in their schedules with PSAs. But in addition to plugging gaps, the broadcasters also had another incentive for running these ads.

Dating back to the Federal Radio Act of 1927, broadcasters – in exchange for their use of the public electromagnetic spectrum – have had an obligation to serve "the public interest, convenience, and necessity."<sup>6</sup> While the vague wording of this and subsequent regulations left much room for interpretation, broadcasters were expected to provide some evidence of service to the community each time they renewed their licenses with the FCC. One of the ways they could accomplish that was to run public service ads, which the FCC defined as a community service ad "for which no charge is made."<sup>7</sup> What emerged during this time was a three-way partnership: a nonprofit or government agency would seek out the support of the Ad Council to help develop a public education effort to promote its

cause, typically picking up the costs for production; advertising professionals (working at the behest of the Ad Council) would offer their time and creative ideas pro bono; and media organizations would donate space to run the ads, thereby, in the case of broadcasters, helping to meet their public service obligations.

By the 1960s, public service advertising had become a highly visible part of the American television landscape – fueled in part by the social activist spirit of the times. The Ad Council worked closely with government agencies and nonprofits to address the many hot-button issues of the day – war overseas, growing urban poverty, pollution, increased drug abuse. Amid all of this social turbulence, the ad industry itself was going through a creative revolution that, among other things, tried to bring more realism, candor, and sophistication to ads. The combination of these forces – controversial social issues all around, more proactive advocacy groups, and a new generation of ad writers looking for creative outlets – led to a golden creative era in public service ads.<sup>8</sup>

It was during this period that some of the most memorable images of public service advertising were produced. A commercial targeting litter and pollution featured an American Indian named Iron Eyes Cody, who was shown paddling a canoe while observing the desecration of the American landscape; the character responded, wordlessly, by shedding a single tear, as the ad's tagline urged: "Keep America Beautiful." Other public service ads at the time took on sensitive issues such as racism, with heart-wrenching ads for the United Negro College Fund that featured the slogan: "A mind is a terrible thing to waste." Meanwhile, the Ad Council's campaign promoting automobile safety, urging the public to "buckle up" safety belts and to avoid driving after drinking alcohol, began to alter behavior and shift public attitudes. The Ad Council's own research found that after the campaign began running, seat belt usage in America tripled.<sup>9</sup>

By the 1980s, the Ad Council was no longer the only major advertising coalition working on PSAs. The Partnership for a Drug-Free America, formed in 1987, focused on the single issue of drug abuse. One of the Partnership's first TV commercials remains one of its most famous: "This is your brain," a voice-over declared as the camera focused on an egg; as the egg was broken and fried, the announcer added: "This is your brain on drugs. Any questions?" The Partnership began to saturate the American media with its messages in the late 1980s and early 90s – producing a volume of ads second only to McDonald's at the time. At one point, 92 percent of American teenagers reported that they had seen the "Fried Egg" commercial.<sup>10</sup> In the early 1990s, the Partnership and the Ad Council were joined by a growing number of groups and charities that had begun to produce ads independently of these two national organizations – and public service advertising seemed to be reaching peak levels in America.

In recent years, however, there have been new debates about the amount of airtime being donated to PSAs. Doria Steedman, who heads up the Partnership for a Drug-Free America, says that before her organization began paying for ad time it was having more and more trouble getting its messages on the air. "There was an erosion of what the media was able to give us," Steedman says. "Several networks told us they were only going to be able to give us 10-second spots. And our chances of getting into prime time – slim always – became close to none."<sup>11</sup>

One study in the mid-90s by two leading advertising industry associations showed that it was becoming more difficult for PSAs to get on the air, especially during prime time. According to the American Association of Advertising Agencies and the Association of National Advertisers, the amount of time on average donated to PSAs on the major networks during prime time dropped from 11 seconds an hour in 1992 to just four seconds per hour in 1995, prompting Hundt to exclaim that PSAs had "dried up like rain in the desert."<sup>12</sup>

Reaching a prime time audience with a PSA doesn't seem to have gotten any easier in this decade. The Kaiser Family Foundation study documents approximately five seconds per hour on average for donated public service advertising on the four major networks during prime time.

Of course, there is one big problem with the debates over whether broadcasters are donating enough to PSAs, and that is that it's difficult to assess exactly how much public service advertising is actually running these days. The Ad Council, for example, estimates the value of donated television for its own PSAs in 2000 at approximately \$316 million and has found, according to its president, Peggy Conlon, that the amount of overall time broadcasters donate to PSAs has remained steady at about 6 percent of all advertising inventory.

In 2000, the National Association of Broadcasters (NAB) used self-reporting from local stations to estimate that local broadcasters donated \$5.6 billion to PSAs the previous year, of which \$1.8 billion was from television.<sup>13</sup>

Critics note that these numbers can be misleading because they value donated ad time at the highest full retail rate, even though airtime is typically sold at a discount (particularly hard-to-sell slots, which is where PSAs often end up running). When the NAB testified before the Gore Commission, a Presidential Committee charged with examining the public interest obligations of broadcasters in the digital age, some of these questions were posed to the survey's pollster. "What was clear is that most of these PSAs are running at 3:00AM and that the term PSA has been redefined to include all this other stuff and inflate the overall amount," explains Norman Ornstein, the co-chair of the Gore Commission.

The bottom line is that even as society has debated the very definition of PSAs and broadcasters' responsibility to run them, according to Andrew J. Schwartzman, president and CEO of the Media Access Project, nobody has been able to "answer with any specificity how much *time* is really being devoted to PSAs."

The growth of cable television in the past decade has opened up new outlets, at least to a limited degree. The Kaiser Family Foundation finds that cable stations, which are not required by the same 1927 obligations as broadcasters to serve the public interest, dedicate about half as much airtime as broadcasters *overall* (seven seconds per hour vs. 17 seconds per hour on average), but donate somewhat more time during *prime time* (eight seconds per hour vs. broadcasters' five seconds).

In trying to explain the apparent decline in donated PSAs on broadcast television during prime time, the ad industry groups point to a strong 1990s economy that left little ad time unsold. But some critics contend that the real issue is the lack of specificity and accountability with regard to broadcasters' obligations to run PSAs. With no specific quotas mandated, nor any stipulation that ads run at certain times, broadcasters have had tremendous leeway in deciding how many (if any) PSAs to run, as well as who they will accept such ads from and when they will run them – a system that is unlikely to change in the near future.

According to former FCC Chair Reed Hundt, the vague wording of existing regulations has become more and more of a problem in recent years, as competition within the television industry has heated up. "The FCC lacks the will to impose public service regulations and rules that are clear and specific and that apply equally to everyone," he says. "Instead, we've continued to rely on an unwritten agreement by broadcasters to run PSAs – and unwritten deals are bound to be broken, especially as the competition for eyeballs becomes more fierce."

Others think it's folly, given the political and economic reality, to even bring up the "R" word. "The regulation train left the station 15 years ago," notes Conlon, "and it's not coming back. I think it's naive of our industry to think we can make big daddy government make these communications outlets do things for us that they don't want to do. That's not the way we are going to compete in this marketplace."

But what is clear is that "paid PSAs" and promo-style PSAs (in which a network receives visibility, for example, by featuring its own stars as part of a message addressing a social issue) are a significant part of the current landscape. According to the Kaiser Family Foundation study, 25 percent of PSAs on the major broadcast networks now feature one of their own celebrities. Broadcasters say that these trusted celebrities are highly effective spokespeople for the causes they espouse and can capture a viewer's attention as effectively, if not more so, than an unknown spokesperson. Indeed, today, the Ad Council as well as others often work in partnership with broadcasters to produce promo-style PSAs that bring attention to a particular social problem.

Critics of this trend worry that paid PSAs – whether they include a corporate sponsor or not – could eat up time that might be donated to unpaid ads, and otherwise favor well-funded, and perhaps less controversial, causes. But the Ad Council's Peggy Conlon says she hasn't seen as yet any significant adverse effects. "I don't think we've seen a measurable decrease in public service advertising as a result of the paid campaigns. Is that a possibility in the future? Sure, you can't discount it. But it hasn't had an impact yet." To try to counter the possibility that donated PSAs could get squeezed out, the ONDCP incorporated a "match" into its campaign. This practice requires broadcasters that accept the program's paid antidrug ads to donate equal time to unpaid PSAs featuring complementary messages – or to use the same kinds of messages in their programming.

The public service marketplace has also expanded to include another kind of “hybrid” ad that is part public service and part public relations. Serious issues and causes are being adopted by companies with a sales agenda. Beer companies such as Anheuser-Busch increasingly use ads to promote “responsible” drinking, while recent commercials by Philip Morris, which owns cigarette brands, have centered on the plight of battered women and the company’s contributions to that and other social causes. It should be noted that the Kaiser Family Foundation study finds that these corporate public service messages are fairly infrequent, averaging less than one second an hour.

Another change that PSA experts have noted over the past decade is the crowding of the public service marketplace, as more nonprofits than ever try to use advertising to draw attention to their issues. This trend has added to the already fierce competition for limited airtime, but it has also had another effect, according to leaders in the advertising industry. Over the years, the public has been exposed to so many appeals from so many different groups that many television viewers have become somewhat jaded to or are simply tuning out the multitude of messages they see. Mary Warlick, executive director of the One Club for Art and Copy, which presents awards for creativity in advertising, says public service advertisers in general have more trouble getting noticed because after decades of public service appeals for so many different causes, “the audience has grown numb. You must do something very strong to break through the ambivalence.”<sup>14</sup>

Public service groups must also rely on creative approaches to encourage broadcasters to run their ads. Peter Cohen, an advertising executive who has worked on a number of public service ad campaigns through the years, including an award-winning series of ads for New York City’s Coalition for the Homeless, says that in today’s competitive PSA marketplace, if an ad is not compelling, it may not ever make it on the air. Because networks and local station managers are now inundated with PSAs from so many groups, an ad must be special to get their attention, something especially challenging given the low budgets most of the nonprofit sponsors of PSAs are working under. “I’ve found that the more interesting an ad is,” Cohen says, “the more a station manager will want to run it.”<sup>15</sup>

Some groups are finding that they can get better results by working directly with a broadcaster or cable channel; for example, the Ad Council and the Kaiser Family Foundation, among others, have worked directly with networks to produce and run public service messages. This model enables an organization to secure better placement for its messages by negotiating the commitment up front and developing messages that speak to a particular audience.

Such new approaches may be long overdue. A study by the Harvard School of Public Health suggests that in order to truly effect behavioral changes, public service ads need to abandon shock-and-scare tactics and begin to incorporate some of the more sophisticated marketing approaches used in product ads – including product placements, sponsorships, and working directly with news programs to reach the public.<sup>16</sup>

Public service messages can come under fire, however, when they are delivered outside the context of advertising and in other nontraditional ways. For example, when it was made public that the ONDCP allowed networks to receive credit toward their “match” requirement by incorporating antidrug messages into their shows’ storylines and dialogue, critics raised questions about whether such financial incentives are appropriate.

As more contemporary approaches are being tried, public service ads are also crossing new media frontiers. Recently the Ad Council brought one of the most recognizable figures in public service advertising, Smokey Bear, into cyberspace, where the character today has its own Web site. The rise of new media and the continued splintering of old media is a mixed blessing for public service advertisers. It’s more difficult for a public service ad campaign to have the same kind of widespread cultural impact felt by a “Smokey Bear” or “The Crying Indian.” As the Ad Council’s Peggy Conlon observes: “In the past, we could take one image or message and reach everyone, just using the three networks,” she says. “It’s a more challenging job because you can’t reach a 30-percent share of all television viewers with one spot. Those kinds of audiences aren’t amassed anymore.” The flip side of media fragmentation is that it makes it even more possible to target PSAs to a specific audience. In some ways, the Internet and other interactive mediums could turn out to be the ideal environment for PSAs. They allow public service to move beyond mere attention grabbing to deliver in-depth information immediately on an issue or problem, or to connect people with resources.

Moreover, Web pages and banner ads are relatively inexpensive to produce, an important factor for nonprofits working with tight budgets. According to the Ad Council, Web sites have, so far, been receptive to donating space for PSAs; last year, the Ad Council estimates, the number of its messages appearing on the Internet grew by 500 percent. It remains to be seen how PSAs will fare in this new environment. Will it eventually become as difficult for PSAs to get on prime Web sites as on prime-time television? What motivation will online companies have to serve the public interest in the future? Will the expected convergence of old and new media push PSAs further to the margins or create more opportunities to get the messages out in more effective, innovative ways? Stay tuned. These are just some of the questions that face public service advertising as it enters a new era and a changing media landscape.

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Warren Berger is the author of the book “Advertising Today,” (Phaidon Press, 2001), an overview of trends in contemporary advertising, including PSAs. He also writes frequently about advertising and the media for the *New York Times*, *Wired* magazine, and *Advertising Age*.

## ENDNOTES

- <sup>1</sup> *Los Angeles Times*, August 20, 1998, p. A1.
- <sup>2</sup> “National Report on Local Broadcasters Community Service,” published by the NAB, April 2000, p. 3; also, Ad Council’s 2000 Annual Report.
- <sup>3</sup> “Shouting to be Heard: Public Service Advertising in a New Media Age.” A Report by the Kaiser Family Foundation on television content (2001) (Authors: Walter Gantz, Ph.D. and Nancy Schwartz, Indiana University).
- <sup>4</sup> “The Ad Council at 50,” *Advertising Age*, November 11, 1991, p. A2.
- <sup>5</sup> *ibid.*, p. A6.
- <sup>6</sup> Federal Radio Act of 1927, 44 Stat 1162 (1927).
- <sup>7</sup> FCC Rules, Section 73-1810 (d) (4).
- <sup>8</sup> “The Ad Council at 50,” *Advertising Age*, November 11, 1991, p. A8.
- <sup>9</sup> *New York Times*, November 20, 2000, p. F6.
- <sup>10</sup> *Forbes*, February 4, 1991.
- <sup>11</sup> Doria Steedman interview, *ONE Magazine*, Vol. 2, issue 3, p. 16.
- <sup>12</sup> *Television Digest*, March 10, 1997.
- <sup>13</sup> “National Report on Local Broadcasters Community Service,” published by the NAB, April 2000, p. 3.
- <sup>14</sup> *New York Times*, November 20, 2000, p. F6.
- <sup>15</sup> *ibid.*
- <sup>16</sup> “Recommendations for Future Mass Media Campaigns to Prevent Preteen and Adolescent Substance Abuse,” Harvard School of Public Health, 1990.

# PUBLIC SERVICE ADVERTISING, BROADCASTERS, AND THE PUBLIC INTEREST

## Regulatory Background and the Digital Future

By Craig LaMay

When the National Association of Broadcasters (NAB) testified before the President's Advisory Committee on the Public Interest Obligations of Digital Television Broadcasters (also known as PIAC, or the Gore Commission) on April 14, 1998, the Commission's co-chair Norman Ornstein commented: "We have to determine as we move – because our focus is not what broadcasters are doing now but what broadcasters will do in the digital age – what the changes in technology, the changes in the marketplace, will mean in terms of public service."<sup>1</sup> The subject at the time was digital television, but the issues went far beyond that. Since the earliest days of radio and television, policy leaders have grappled with what responsibility broadcasters have to serve the public interest, whether those obligations are being met, and how to make sure public service keeps pace with new technologies. While public service advertisements (also known as public service announcements or PSAs) make up a negligible slice of the literature on broadcast regulation, in many ways the subject captures the whole history of the public interest standard.

Broadcasting in the United States is based on a legal quid pro quo: In return for free and exclusive channel assignments on the public's electromagnetic spectrum, broadcasters are required to serve "the public interest, convenience, and necessity."<sup>2</sup> Those six words have been the subject of much debate ever since they were first adopted for use in the Federal Radio Act of 1927. In 1934, a reform-minded Congress

briefly considered revising the law to set aside a portion of the spectrum for educational and nonprofit use, but the networks and the NAB argued that no such set-aside was necessary. William Paley, at the time chairman of CBS, told the Senate Commerce Committee in 1930 that no more than 30 percent of his network's programming would be sold and that the balance would be available for educational and non-commercial programming, a pledge he reiterated in 1934.<sup>3</sup> Louis G. Caldwell, the NAB's lawyer, defended the public interest language, writing in 1929: "If all this be censorship, it seems unavoidable and in the best interests of the public."<sup>4</sup>

In the end, the 1934 Communications Act was, so far as radio broadcasting was concerned, a near-verbatim reproduction of the 1927 law, except that it abolished the old Federal Radio Commission and established in its place the Federal Communications Commission (FCC). As television developed in the years after World War II, the public-interest requirements of the law applied to television licensees too, and though several important regulations involving station ownership, license terms, and public-interest record-keeping have been loosened over the years – most recently by the 1996 Telecommunications Act – the social compact at the heart of the regulatory scheme remains the same.

The Telecommunications Act itself was the end result of a long attempt, beginning in the mid-1970s, to redraft the law consistent with technological and economic changes in the communications industries, one of the most significant being the introduction and development of digital television. Digital television is distinct from its analog forebear in that it permits broadcasters to send multiple streams of programming, including high-definition video and interactive services – in short, to create entirely new businesses with new streams of revenue. As of March 2001, 133 digital broadcast television stations were on the air in the United States.<sup>5</sup>

One of many questions digital television raises is what kind of service the public should expect for this new use of its property. After examining a range of options with respect to this question, the Gore Commission urged that PSAs become a more substantial and documented part of broadcasters' community service – a departure from the way the FCC treats PSAs today.<sup>6</sup> The FCC allows broadcasters to count PSAs toward their statutory public service programming obligations.<sup>7</sup> However, like most FCC regulations focusing on mass media content (and thus raising First Amendment concerns), the language concerning PSAs is vague. Current FCC rules simply require commercial television broadcasters to keep in their file for public review a list of community issues addressed by the station's programming during the preceding three-month period. According to those rules, PSAs count toward fulfilling broadcasters' obligations.<sup>8</sup> Yet there are no quantitative requirements for PSAs. The FCC doesn't tell broadcasters what kind of PSAs to run or when to run them, nor does it monitor their use.

Even the definition of a PSA itself has been a source of debate. A PSA, according to the FCC, is as an advertisement "for which no charge is made and which promotes programs, activities, or services of federal, state, or local governments or the programs, activities, or services of nonprofit organizations or any other announcements regarded as serving community interests."<sup>9</sup> However, today many organizations purchase time for their public service campaigns. Turn on the television and one sees antitobacco or antidrug PSAs paid for by the American Legacy Foundation and the Office of National Drug Control Policy (ONDCP). Buying time is the only way PSA sponsors can guarantee placement for their spots in prime time or in programming watched by their target audience.<sup>10</sup> It is not clear that broadcasters themselves distinguish between paid time and free time in their own accounting of public service. In the 1998 survey that the NAB presented to the Gore Commission, for example, the polling firm that conducted it, Public Opinion Strategies, did not explicitly distinguish between paid and free time in the wording of its question on the subject. Rather, it asked respondents about the number and dollar value of PSAs they aired.<sup>11</sup>

Despite the confusion and controversy surrounding PSAs, only twice has our country examined what responsibility, if any, broadcasters have to air them. The first time was in the form of an FCC inquiry in the late 1970s, back when broadcast television was dominated by three national networks and cable was still a rural signal-delivery service. The second time was two decades years later, when the Gore Commission was appointed by then-President Clinton to explore these questions with respect to the emerging digital television service. The FCC examination was prompted by the San Francisco-based Public Media Center, which filed a petition with the agency in 1976 urging it to develop a quantitative PSA requirement. In 1978, the FCC opened an inquiry into the matter, examining both industry practices and the role that PSAs could or should play in the public service mix.

In its petition to the FCC, the Public Media Center claimed that broadcasters gave short shrift to PSAs generally, burying them in unfavorable hours, and to local citizens groups and charities specifically, favoring PSAs provided by the Ad Council and other nationally known and for the most part non-controversial groups. The petitioners proposed that broadcasters be required to present a minimum of three PSAs, totaling a minimum of 90 seconds, every two hours throughout the broadcast day.

They also wanted the FCC to limit the number of PSAs a licensee or network could accept from a single entity and to require that a certain percentage of PSAs be of local origin. To further that goal, the petition called on broadcasters to make available to local organizations facilities and other assistance that would help them create PSAs. Finally, the petitioners urged the Commission to study licensee and network practices governing the acquisition and airing of PSAs.

In response, broadcasters and others opposed to the petition argued two things: that decisions about PSAs fell within the bounds of editorial discretion reserved for broadcasters by statute and by the First Amendment, and that there was no evidentiary basis for the FCC to act.\* The Commission agreed and at first denied the petition.<sup>12</sup>

It then reconsidered the issue and chose to conduct the study on PSA practice that the Public Media Center had requested.<sup>13</sup> In doing so, the FCC noted that "Congress as well as governmental agencies such as the Federal Trade Commission and the Department of Health and Human Services are interested in the employment of PSAs in answering public needs."<sup>14</sup>

At the time, the only data the FCC had on PSAs were those contained in license renewals, and that was not much: radio and television stations simply indicated how many PSAs they aired during a "composite" week. The FCC thus asked stations (and everyone else) to respond to its Notice of Inquiry with information about the time given to and the timing of PSAs, the nature of the PSAs aired, the sources of PSAs aired, the criteria for selecting them, and how useful such advertisements were in serving the public.<sup>15</sup>

Because of the self-selected nature of the responses, the FCC admitted, the picture that emerged was statistically flawed but nonetheless, the agency thought, revealing. The average television and radio station reported airing one to two PSAs per hour, about 200 per week, the equivalent of 1 percent to 2 percent of all broadcast time. According to the FCC, PSAs ran from 10 seconds to 60, with most running 30. These messages were "not necessarily aired in graveyard hours," the commission reported, but nor were they "centered in drive and prime-time periods."<sup>16</sup> About 7 percent of all PSAs were directed to children under 12, though only 20 percent of child-oriented PSAs aired during programming directed to children.<sup>17</sup> In 1980, the most common PSAs concerned health and safety issues, followed by social services, civic activities, and environmental concerns. "PSAs concerning controversial matters," the FCC found, "are not usually aired."<sup>18</sup>

Broadcasters themselves reported that local public service was the criterion by which they chose to air PSAs, though they also said they rarely solicited any PSAs but rather chose from what was provided them and usually acquired PSAs in packages rather than individually. Not surprisingly, some non-broadcast parties responding to the FCC's inquiry were of the view that availability and convenience were the chief criteria governing PSA selection – a complaint that is still heard today.

\*The Advertising Council, for example, offered this definition: "A PSA is an announcement for which no commercial charge is made by the broadcasters or by the nonprofit agency, government body, or individual providing the message, the purpose of which is to improve the health, safety, welfare, or enhancement of people's lives and the more effective and beneficial functioning of their community, state or region. Such messages shall not be commercial, political or designed to influence legislation."

The Committee for Open Media suggested: "A PSA is a non-routine, non-billable message which 1) informs viewers and listeners about a service, program, or activity of community interest or 2) which provides a forum for individuals or groups to express their ideas, viewpoints, or opinions. Time signals, routine weather announcements and station promotional announcements are not PSAs."

Two years after it began, the agency terminated the proceeding, ultimately declining to set any kind of PSA requirement. In evaluating the responses it received, the FCC questioned whether the PSA definition\* should be modified to reflect the particular purposes for which PSAs are aired, or perhaps to encourage attention to controversial subjects.<sup>19</sup>

In the end, the agency was convinced to avoid any such modification, but it did change its reporting procedures to enable licensees to receive greater credit for their PSAs in the "other" programming category of their annual programming report and in their renewal application forms.<sup>20</sup> The agency also abandoned its practice of distinguishing between collective PSAs (community bulletins) and individual PSAs. In either case, the agency said, licensees could receive public service credit.<sup>21</sup>

In an effort to be consistent with the Americans with Disabilities Act, the FCC required in 1991 that PSAs produced by the federal government carry closed captioning; otherwise the Commission exempts PSAs from closed captioning requirements.

Two years later, in 1993, the FCC noted that PSAs were among the "public interest programming" offered by home shopping channels when it qualified these channels as local commercial television stations for purposes of mandatory cable carriage.<sup>22</sup> At one point, the FCC also accepted PSAs as legitimate programming under the 1990 Children's Television Act.<sup>23</sup> In 1996, however, a divided FCC said that PSAs could not meet any part of its core children's programming requirement under the Act.<sup>24</sup> Core programming, the Commission has said, consists of programs at least 30 minutes in length.<sup>25</sup>

Other than those modifications, it wasn't until the late 1990s that an FCC chairman and, ultimately, a Presidential Commission took another close look at the PSA obligations of broadcasters. In March 1997, then-FCC Chairman Reed Hundt complained publicly that television public service advertising on the four major networks had "dried up and disappeared like rain in the desert" following a report on the subject by the American Association of Advertising Agencies and the Association of National Advertisers.<sup>26</sup>

According to the report, the amount of network time devoted to PSAs peaked in 1992 at about 11 seconds per hour during prime time but by 1995 had fallen to four seconds per hour. Over the same period, the report went on to note, time given to other kinds of commercials, and in particular network self-promotions, had increased by 8.5 percent to almost four-and-a-half minutes.

Hundt promptly asked the NAB to supply time and dollar figure data for both PSAs and network promotions for the previous 10 years and asked further whether "broadcasters have any obligation to run any PSAs as a condition of receiving a broadcast license."<sup>27</sup> A month later, at the annual NAB convention, Hundt stated his view that "liberal use of public service announcements" were among the essential ingredients of public service, suggested that 60 prime-time seconds each night was about right,<sup>28</sup> and urged broadcasters to draft a voluntary code for their use.<sup>29</sup>

Going still further, the chairman also criticized the networks' practice of using celebrities from their own programs to discuss social issues. These spots, Hundt said, did not really count as PSAs even "by the networks' own definition"; such ads, he said, served a "commercial purpose rather than the public interest."<sup>30</sup>

\*Among the nonbroadcast parties opposed to any quantitative requirement were the United Way, the Boy Scouts of America, the President's Council of Physical Fitness and Sports, the Lexington League of Women Voters, and the United Negro College Fund. Nonbroadcast parties supporting the requirement included the United Church of Christ, the Federal Trade Commission, the Southern California Committee for Open Media, and the Council on Children, Media, and Merchandising.

In response, ABC and NBC stated that their use of celebrities greatly improved the effectiveness of these announcements. An NAB spokesman called Hundt's attack on celebrity spots "mind-boggling" and asked rhetorically, "Who would be more effective delivering an antiviolence PSA than Bill Cosby?"<sup>31</sup>

The inquiry sparked a heated exchange between Hundt and the NAB, which stated that the data Hundt was seeking did not exist and implied its absence was the FCC's own fault. "Your focus on PSAs as a unique measure of public service is indeed difficult to understand in light of the Commission's outright rejection of educational PSAs [as counting toward children's programming obligations]," NAB President Edward Fritts wrote. Hundt fired back, saying that if the NAB could not provide the information the Commission wanted, "perhaps it would be a good idea to seek to gather such information as part of our larger public interest inquiry."<sup>32</sup>

Hundt's displeasure was magnified a year later when news broke that the Office of National Drug Control Policy (ONDCP) was going to pay for prime-time network placement of its antidrug messages. Why, he asked General Barry R. McCaffrey, then head of the ONDCP, should the public have to "buy the right to use its own medium?"<sup>33</sup> The government had tried to allay these kinds of concerns by negotiating a "match," requiring the media to donate an equal amount of airtime on complementary topics in exchange for the government's unprecedented purchase.

By January 2000, Hundt had left the FCC and been succeeded as chairman by William E. Kennard. But as Hundt had promised, the FCC's Notice of Inquiry on the Public Interest Obligations of Television Broadcast Licensees included language concerning the role of PSAs in public service.<sup>34</sup>

In April 2000, the NAB released figures estimating that the nation's radio and television broadcasters had contributed some \$8.1 billion worth of "public service" airtime to their communities between August 1998 and July 1999. Of that sum, the single largest amount, \$5.6 billion, of which \$1.8 billion was said to be from television, was, according to the NAB, "donated" to PSAs.<sup>35</sup> The data were based on a survey of broadcasters conducted for the NAB by Public Opinion Strategies, and NAB President Edward Fritts deemed them "honest, conservative, and unassailable."<sup>36</sup>

Critics assailed anyway, questioning the methodology and sample used in the survey, and thus the validity of its results. The trade magazine *Broadcasting & Cable* reported that the survey's methods might have accounted for the increase over comparable data from 1998, when the NAB had valued its total public service contribution at \$6.8 billion and its PSA activity at \$4.6 billion.<sup>37</sup>

At the time, critics raised questions about whether the broadcast television industry had received a financial windfall when the FCC set the terms for awarding spectrum assignments for digital television. Unlike other spectrum allotments, those for digital television were not open to competitive bidding but were available only to incumbent license holders. Congress declined to charge a fee of any kind for the spectrum in 1996, leading then-presidential candidate Bob Dole to characterize the licensing process as a "giveaway" of public property worth \$70 billion.<sup>38</sup>

Many commentators at the time questioned the terms of the 1996 Telecommunications Act, pointing out that while the Act made profound changes in the regulatory regime governing virtually every other communications industry, it made no changes in the underlying system of broadcast spectrum allocation that has existed since 1927. At the same time, the law dramatically loosened ownership rules in broadcasting (radio and television), made license renewals easier, and in television extended license periods from five to eight years.<sup>39</sup>

Against that backdrop, in 1997, the White House convened the President's Committee on Public Interest Obligations of Digital Television Broadcasters. Chaired by Norman Ornstein, a resident scholar at the American Enterprise Institute, and Leslie Moonves, the president and CEO of CBS Television, this advisory committee was composed of 22 representatives of the broadcasting and computer industries, the public interest and labor communities, and academics. Its charge was to examine the future of digital television and to make recommendations concerning the public service obligations that should attach to it.\* In its final report, issued in December 1998, the Committee specifically identified PSAs as a potentially important component of public service.<sup>40</sup> It proposed that "a minimum commitment to public service announcements should be required of digital television broadcasters, with at least equal emphasis placed on locally produced PSAs addressing a community's local needs. PSAs should run in all day parts including in prime time and at other times of peak viewing."<sup>41</sup>

This recommendation, with its focus on local community needs, was augmented by two others: first, that licensees make a greater effort to disclose and publicize their public service activities and programming on a standardized reporting form; and, second, that the FCC reinstate a needs-ascertainment requirement for broadcasters, a requirement, dropped in 1984, that broadcasters actively canvass their communities to see what concerns them.<sup>42</sup> Finally, PIAC recommended that PSAs be closed-captioned.<sup>43</sup>

In talking about the reason behind the disclosure requirements, Ornstein explains, "We wanted first of all to create a mechanism that would realistically rely as much on public disclosure, and then pressure, as on a regulatory scheme. We thought that if we could get regular disclosure of all the things they were doing posted on the Internet, that would be a powerful weapon."<sup>44</sup>

The PIAC report includes a proposed "certification form" with which broadcasters can, through their responses to 24 questions and submission of several pieces of evidence, record and quantify how they are fulfilling their public service obligations on a quarterly basis. The form includes these specific questions about PSAs:

- *The licensee airs at least [-]\* locally originated public service announcements during a three-month period. YES or NO*
- *At least [-] of these public service announcements are aired between 6 AM and midnight. YES or NO*
- *The licensee airs at least [-] other public service announcements during a three-month period. YES or NO*
- *List in Exhibit E a representative sample of no fewer than five local and five national issues addressed by public service announcements during the past three months.*

This standardized disclosure is now before the FCC in a Notice of Proposed Rule Making (NPRM). Broadcasters will likely object to the proposals on the grounds that, as the Supreme Court noted in *Turner Broadcasting v. FCC I*, "the FCC's oversight responsibilities do not grant it the power to ordain any particular type of programming that must be offered by broadcast stations."<sup>46</sup> The Public Interest Council, a group of broadcast industry lawyers writing for the Media Institute, has argued that the mere provision of "free, local, universally available, over-the-air television...is an entirely sufficient payback for the so-called gift of additional spectrum for the transition to digital."<sup>47</sup>

Before stepping down as FCC chairman in January 2001, William Kennard urged Congress to re-examine the terms by which television broadcasters are supposed to convert fully to digital, and he blasted broadcasters for having "increasingly elevated financial interest above the public interest."<sup>48</sup> Just before leaving office, Kennard released an FCC report outlining 11 principles for broadcaster public service, part of which called on broadcasters to air more PSAs of local origin and relevance. "Given the importance of PSAs to their communities," the report said, "broadcasters should exercise their best efforts to attract and then air locally produced PSAs. Airing these announcements during peak viewing hours will ensure that such PSAs have maximum exposure for maximum service to the community."<sup>49</sup>

While it is too early to say how new FCC Chairman Michael K. Powell will view these recommendations, his initial public remarks on the FCC's oversight duties suggest that he will move much more cautiously than his predecessors.<sup>50</sup> With respect to the disclosure NPRM now before the agency, for example, Powell said last year that "the recommendation that certain categories of programming be identified on the form raises serious First Amendment concerns" because they "involve the Commission in content-based regulations."<sup>51</sup>

So, whatever the future holds for public service announcements in broadcasting, it will likely unfold against the same broad backdrop of public service regulation that has existed since the passage of the Radio Act, despite long-standing proposals from across the political spectrum for regulatory reform.

In 1982, for example, then-President Reagan's FCC Chairman Mark Fowler called the fiduciary model of the public interest a collection of "legal fictions" that served primarily to insulate broadcasters from competition and, indeed, to give them certain competitive advantages.<sup>52</sup> Fowler urged that broadcasters be relieved of their public interest obligations, be given "squatter's rights" in their spectrum assignments, and pay a small fee for them, with the fee going to support public broadcasting and other broadcast services poorly served by the market.\*\*

More recently, long-time FCC counsel and broadcast lawyer Henry Geller has also urged Congress to forgo the current regulatory system on First Amendment and administrative grounds, and instead "substitute a modest spectrum usage fee based on a percentage of gross revenues."<sup>53</sup> Geller's proposal is briefly described and included for consideration in the Gore Commission report as an alternative to imposing public service obligations.<sup>54</sup> So too is a modified fee proposal known as "pay or play," in which commercial broadcasters can essentially avoid their obligations through payment. Presumably broadcasters should embrace deregulation of this sort, particularly where, as in Geller's case, it rests on the idea that broadcasting should enjoy the same First Amendment protections and editorial discretion as print media. Yet even in the midst of the recent FCC inquiry into the public service obligations of digital broadcasters, NAB Chairman Edward Fritts told an audience of broadcasters that the "NAB has never questioned that the FCC can and should impose on broadcasters a commitment to serve the public."<sup>55</sup>

\*Arguably, the commission's work represented the first basement-to-attic review of the social compact in broadcasting since 1946, when the FCC published its ill-fated "Blue Book," a critical review of broadcaster public service. See "The Public Service Responsibility of Broadcast Licensees," Federal Communications Commission, March 7, 1946.

\* Minimums to be determined by the Federal Communications Commission.

\*\* Fowler was the first FCC chairman to challenge directly the fiduciary model as offensive to the First Amendment, noting, as many others have, the intertwining of broadcaster influence and congressional oversight. A PSA example illustrates the point: The NAB, in partnership with the Congressional Club, has each year since 1987 offered to congressional spouses and their children the opportunity to tape PSAs on topics such as alcohol abuse, prenatal care, and cancer prevention for distribution in their home districts. Whatever the public service value of such messages, they are presumably helpful to congressional representatives eager to appear engaged with their communities but who may not themselves appear in PSAs without invoking the equal time rule. It seems reasonable to ask whether the arrangement also benefits broadcasters eager to maintain their unique status under the law. See, for example, David Rosenbaum, "TV Ads by Congressional Wives Are a Sweet Deal for All Involved," *New York Times*, July 13, 1999, A1. More generally, PSAs have in the past been the subject of complaints under the Fairness Doctrine (13 FCC 1246, June 1, 1949), which the FCC stopped enforcing for First Amendment reasons in 1987.

As a matter of regulatory policy for broadcasters, there seem to be two possibilities for public service announcements in the digital future. One is that the PIAC proposals meet some success in the Notice of Proposed Rule Making such that PSAs are codified as a public service, with some minimum quantitative standards, or as a useful adjunct to PIAC's proposed ascertainment and disclosure requirements.

A second future scenario for regulation is not much different from the present: Broadcasters will have little incentive to air PSAs except as a matter of community goodwill, as filler for unsold advertising time, or, in the case of paid campaigns, as a source of revenue. These incentives would presumably be unchanged even if at some point Congress and the FCC were to abandon the fiduciary model, with or without spectrum fees – or, for that matter, if the FCC were to disappear tomorrow.

"Many broadcasters are doing good things," explains Ornstein. "But I think that most of what you see with broadcasters and PSAs is if they can do it in a way that doesn't cost them a dime in ad revenue and if they can use it to promote their self-interest and self-image they'll do it."<sup>56</sup>

Yet, some parties in this debate don't see a conflict between the interests of broadcasters and those of public interest groups. "I think there is an awful lot of rhetoric out there, 'Broadcasters should do more, should do more, should do more,'" comments the Ad Council's Peggy Conlon. "I think we have to balance that with the fact that they recognize they have obligations to their communities, but they are also organizations that are in a very competitive environment, and they're businesses. I think if we don't recognize that, we'll be making a big mistake. We should be just as interested in their viability as a successful communications outlet. Because if their business model fails and they go away, who will run our spots?"<sup>57</sup>

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#### ENDNOTES

- <sup>1</sup> Comments by Norman Ornstein, senior fellow at the American Enterprise Institute and co-chair of the Gore Commission, on April 14, 1998. The hearing, which took place at the headquarters of the National Association of Broadcasters, featured testimony by Jack Goodman, vice president and policy counsel of the NAB, and William D. McInturff, a partner with Public Opinion Strategies, which had conducted an NAB survey on its member stations' public-service activities.
- <sup>2</sup> U.S. Code 44 Stat. 1162 (1927).
- <sup>3</sup> William S. Paley, "Radio and the Humanities," *Annals of the American Academy of Political and Social Science*, January 1935, 23-24.
- <sup>4</sup> Robert W. McChesney, "Conflict Not Consensus: The Debate over Broadcast Communication Policy, 1930-1935," in *Ruthless Criticism*, ed. William Solomon and Robert McChesney (Minneapolis: University of Minnesota Press, 1993), 224.
- <sup>5</sup> Federal Communications Commission, "DTV Stations on the Air," available at [www.fcc.gov/mmb/vsd/files/dtvonair.html](http://www.fcc.gov/mmb/vsd/files/dtvonair.html), April 13, 2001.
- <sup>6</sup> Report of the President's Advisory Committee on Public Interest Obligations of Digital Television Broadcasters, Sec. 3, "Recommendations of the Advisory Committee," (Washington, December 18, 1998).
- <sup>7</sup> See generally *In the Matter of Petition to Institute a Notice of Inquiry and Proposed Rule Making on the Airing of Public Service Announcements by Broadcast Licensees*, 81 FCC2d 346, 1980.
- <sup>8</sup> 47 Code of Federal Regulations 73.3526(e)(11).
- <sup>9</sup> FCC Rules, Section 73.1810 (d) (4).
- <sup>10</sup> Don Shultz, interview, October 25, 2000. Schultz is an advertising consultant and professor of Integrated Marketing Communications at Northwestern University. One kind of paid PSA is known as a "noncommercial sustaining announcement" (NCSA), and such ads typically are placed at sharply discounted rates paid not to individual stations but to state broadcasting associations, which actually place the ads. The state broadcasting associations are free to use the revenue from NCSAs as they see fit, including for lobbying activities. See Doug Halonen, "When Free Ads Aren't: Some Nonprofits Pay for Promos," *Electronic Media*, February 15, 1999, 23.
- <sup>11</sup> *NAB Survey of Public Affairs Activities: Interview Schedule for National Report*, (Alexandria, Va: Public Opinion Strategies, August 1997). The key questions concerning PSAs in the survey instrument are nos. 11 (concerning issues addressed by PSAs); 19 (concerning the total dollar value for PSAs for 1996-97); 20 and 22 (concerning the number of PSAs aired per week and per day, respectively); and 21 (concerning the percentage of PSAs that were locally produced or concerned local issues).
- <sup>12</sup> Memorandum Opinion and Order, FCC 77-865, 1977.
- <sup>13</sup> Notice of Inquiry, 43 Fed. Reg. 37725, 1978.
- <sup>14</sup> *On the Airing of Public Service Announcements by Broadcast Licensees*, at 348.
- <sup>15</sup> *Ibid.*, at 348-50.
- <sup>16</sup> *Ibid.*, at 352.
- <sup>17</sup> *Ibid.*
- <sup>18</sup> *Ibid.*, at 353.
- <sup>19</sup> *Ibid.*, at 363.
- <sup>20</sup> *Ibid.*, at 367-68.
- <sup>21</sup> *Ibid.*, at 368.

- <sup>22</sup> Federal Communications Commission, *Cable Television Service; Cable Carriage of Home Shopping Broadcast Stations*, 58 Fed. Reg. 39156, 1993.
- <sup>23</sup> Federal Communications Commission, *Radio Broadcast Services; Children's Television Programming*, 58 Fed. Reg. 14367, 1993.
- <sup>24</sup> "Rules 'Mock Reason': Ex-NAB TV Chairman Gabbard Proposes Kidvid Compromise to Hundt," *Communications Daily*, July 25, 1996, 4.
- <sup>25</sup> Federal Communications Commission, *Broadcast Services; Children's Television*, 61 Fed. Reg. 43981, 1996.
- <sup>26</sup> "Hundt Blasts PSA Lack," *Television Digest*, March 10, 1997.
- <sup>27</sup> Heather Fleming, "PSA slice shrinks as commercial pie grows; public service announcements are 'disappearing like rain in the desert,' Hundt says," *Broadcasting & Cable*, March 31, 1997, 19.
- <sup>28</sup> Chris McConnell, "Got a Minute? Hundt wants 60 seconds of PSAs a night from each network," *Broadcasting & Cable*, April 21, 1997, 4.
- <sup>29</sup> "Hundt states his public interest mandate for broadcasters," *Communications Daily*, April 9, 1997.
- <sup>30</sup> "Mass Media," *Communications Daily*, May 5, 1997.
- <sup>31</sup> McConnell, "Got a Minute?"
- <sup>32</sup> "Mass Media," *Communications Daily*, May 12, 1997.
- <sup>33</sup> Judy Pasternak, "Ad Plan: Your Tax Dollars on Drugs," *Los Angeles Times*, August 20, 1998, A1.
- <sup>34</sup> Federal Communications Commission, *In the Matter of Public Interest Obligations of TV Broadcast Licensees*, MM Docket No. 99-360, *Notice of Inquiry*, 14 FCC Rcd 21633, 1999. See also Federal Communications Commission, *Public Interest Obligations of Television Broadcast Licensees*, 65 Fed. Reg. 4211, 2000.
- <sup>35</sup> Paige Albiniak, "Service with an \$8B Smile," *Broadcasting & Cable*, April 10, 2000, 24.
- <sup>36</sup> *Ibid.*
- <sup>37</sup> Transcript of the morning session, Open Meeting of Advisory Committee on Public Interest Obligations of Digital Television Broadcasters, National Association of Broadcasters, Washington, D.C., April 14, 1998, 6.
- <sup>38</sup> Edmund Andrews, "Senators Resist Both Proposals for Auctioning TV Airwaves," *New York Times*, March 16, 1996, A1.
- <sup>39</sup> See generally Thomas W. Hazlett, "Explaining the Telecommunications Act of 1996: Comment on Thomas G. Krattenmaker," 29 *Conn. L. Rev.* 217, 1996. In the Telecommunications Act itself, see Title II, Sections 202 and 203.
- <sup>40</sup> *Report of the President's Advisory Committee on Public Interest Obligations of Digital Television Broadcasters*, Sec. 3, "Recommendations of the Advisory Committee," Washington, D.C., December 18, 1998.
- <sup>41</sup> *Ibid.*, Sec. 3, No. 3.3.
- <sup>42</sup> *Ibid.*, Sec.3, Nos. 1 and 3.1. See also *Programming and Ascertainment Order*, 98 FCC2d 1076, 1984.
- <sup>43</sup> *Ibid.*, Sec. 3, No. 3.5.
- <sup>44</sup> Norman Ornstein, interview, American Enterprise Institute, Washington, D.C., June 29, 2001.
- <sup>45</sup> *Ibid.*, *Appendix A: Public Interest Programming and Community Service Certification Form*.
- <sup>46</sup> *Turner Broadcasting System, Inc. v. FCC*, 114 S.Ct. 2445, at 2463 (1994).

- <sup>47</sup> Laurence H. Winer, *Statement of The Media Institute's Public Interest Council in Response to the Commission's Final Report*, Washington, D.C.: The Media Institute, December 18, 1998. Available at [www.mediainst.org/gore/reaction.html](http://www.mediainst.org/gore/reaction.html).
- <sup>48</sup> William E. Kennard, "What Does \$70 Billion Buy You Anyway?" *Rethinking Public Interest Requirements at the Dawn of the Digital Age*, remarks at the Museum of Television and Radio, New York, October 10, 2000, 2.
- <sup>49</sup> William E. Kennard, *Report to Congress on the Public Interest Obligations of Television Broadcasters as They Transition to Digital Television*, Washington, D.C.: Federal Communications Commission, January 18, 2001, 11.
- <sup>50</sup> Christopher Stern, "New FCC Chairman Favors a Non-Activist Approach," *Washington Post*, February 7, 2001, E1.
- <sup>51</sup> Michael K. Powell, *Statement in the Matter of Standardized Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, MM Docket No. 00-168, September 22, 2000.
- <sup>52</sup> Mark S. Fowler and Daniel L. Brenner, "A Marketplace Approach to Broadcast Regulation," *Texas Law Review*, Vol. 60, 1982, 253-54.
- <sup>53</sup> Henry Geller, *1995-2000: Regulatory Reform for Principal Electronic Media*, Washington: D.C.: Annenberg Washington Program in Communications Policy Studies of Northwestern University, 1994, 21-25.
- <sup>54</sup> The PIAC report is available online from the Benton Foundation, at [www.benton.org/PIAC/report.html](http://www.benton.org/PIAC/report.html). Geller's spectrum fee idea is discussed in the Section 3 of the report, "Recommendations of the Advisory Committee," under proposal 10, "New Approaches to Public Service Obligations in the Digital Television Environment." It is discussed in detail in Appendix D to the report, *Innovative Approaches to Public Interest Responsibilities: A Comparative Analysis*.
- <sup>55</sup> Edward O. Fritts, Speech to Electronic Media and the First Amendment Conference, Washington, D.C., October 24, 2000.
- <sup>56</sup> Ornstein, June 29, 2001.
- <sup>57</sup> Interview with Peggy Conlon, Ad Council, June 15, 2001.

# PSAs IN A NEW MEDIA AGE

By Graeme Browning

Smokey Bear is now fighting forest fires in cyberspace, and he's in good company. Go online these days and you're bound to come across banner ads and Web sites asking you not only to buy more, but also to do more: to become a mentor, recycle your trash, donate an organ, or wear a seat belt. "As these media are maturing, they are bringing public service along with them," explains Peggy Conlon, president of the Ad Council, one of the front-runners in online public service advertising. And they are doing it with mixed results: some realizing great successes, others disappointment.

In 1996, the Washington, D.C.-based Benton Foundation teamed up with the Ad Council to launch its online "Connect for Kids" campaign (initially called KidsCampaign), which features an all-inclusive Web site for people looking for information about how to help children. Over the years, what started as a traditional broadcast public service advertisement (PSA) campaign, where audiences were directed to the Web site, has increasingly used online PSAs – a strategy that makes sense given the rise in the number of people using the Internet since the campaign began. According to former Benton Foundation President Larry Kirkman, the campaign's online PSA received almost 1.2 billion impressions last year – which helped drive the number of monthly visitors to the "Connect for Kids" Web site from 250,000 to as many as one million today.

The experience wasn't quite the same for the New York-based Damon Runyon Cancer Research Foundation, which, for almost five decades, has relied on local television and newspapers to run public service messages publicizing its fund-raising efforts. This spring, for the first time, the Foundation turned its PSA focus to the new world of the Internet – with disappointing results.

Even though the Web site CNBC.com ran ads for the Foundation 15.5 million times over a two-month period, the online PSAs attracted only nine new donors, says Lorraine Egan, the Foundation's executive director. "That's a very small success rate. I calculated it out to be about 0.003 percent," she adds.

Still others, while recognizing the current limitations of the Internet and other interactive mediums, point out that online PSAs can allow their audiences to get immediate access to in-depth information that isn't possible with a traditional 800 number. "There are a lot of myths and misconceptions out there," explains Robert Speildenner, communications manager for the Coalition for Organ Donation, based in Richmond, Virginia. "The Web not only helps us dispel these myths, but also it gives people an easy way to ask somebody about doubts they may have."

While the changing media landscape presents all sorts of opportunities for campaigns trying to get their messages out, many open questions accompany those open doors. Will the Internet and other emerging mediums give PSAs the potential to target audiences more directly and effectively, or will these messages get limited visibility from their new hosts in lieu of any requirements to serve the public interest? Will this new technology be a great equalizer, raising controversial issues and reaching people too often ignored, or will it threaten privacy and exacerbate the so-called "digital divide" between those who have access to the Internet and those who don't? And will the Internet allow nonprofits to run effective PSA campaigns for much smaller sums of money, or will questions continue to be raised about the inherent creative and placement limitations on the Web?

Indisputably, since Smokey Bear made his debut on broadcast television 57 years ago, the media environment within which PSAs must exist has changed dramatically. Recently, MTV Networks announced a plan called MTV360 to unite its online and on-air presence, including a music-download service and cross-promotional activities that send viewers of the television channel online. AOL TV, launched last October, allows AOL subscribers to surf the Web, send instant messages, and watch television, all at the same time. And just a few months ago, ABC announced an upcoming new venture, *LivePlanet*, whose founders include actors Ben Affleck and Matt Damon. *LivePlanet* has been billed as a “reality” TV show that allows viewers to participate either by watching a broadcast of the program or by playing along on the show’s Web site (or, as the network hopes, by doing both at the same time).

Amid these changes, more and more people interested in getting out a message – be it for a commercial or public service purpose – seem to be acknowledging that they can no longer rely solely on the print and broadcast efforts that were sufficient only a few years ago. “The only way to make a real dent today is to decide who your target audience is and then follow that audience in as many different media you can in order to get them to understand your particular message,” explains Joseph Turow, Robert Lewis Shawon professor of communication at the University of Pennsylvania’s Annenberg School of Communication.

For many sponsors of public service messages, that increasingly means going online. Leading market research firms believe that before this decade ends Americans will get the majority of their information from the Internet and other interactive technologies. While only 21 percent, or about 40 million U.S. adults, were connected to the Internet in 1995,<sup>1</sup> today more than 167 million regularly log on at home or at work.<sup>2</sup> And that number is expected to rise even higher in the years ahead.

It came as no surprise that, as the Internet began its meteoric growth in the mid-1990s, advertisers followed their customers online, contributing to 18 consecutive quarters of positive growth, according to the Interactive Advertising Bureau, the leading online advertising association. Yet, high-flying at the beginning of last year – when 17 dot-coms ran commercials during Super Bowl 2000 – online ad sales slowed noticeably after Internet stocks began to plummet only a few months later. “Online advertising is going through its own Death Valley right now,” says Forrester Research Inc.’s Jim Nail in the June edition of *eCompany*, “but there are clearly greener pastures ahead.”

According to a January report Nail authored for Forrester, a leading new-technology research firm, within the next five years marketing on the Internet and in interactive television (ITV) will divert \$40 billion from the traditional media, including 15 percent of the ad revenues for broadcast television and newspapers and 11 percent for magazines. “Far from abandoning the Web, both dot-coms and traditional companies plan to grow their online presence,” predicts the Forrester report.<sup>3</sup> In spite of these rosy forecasts, a good deal of uncertainty remains about the future of Internet advertising – and even more about whether PSAs will be able to ride an online advertising boom or be a casualty of its bust. Clearly, in recent years the presence of online PSAs has increased as more and more advocates use banner ads – those thin boxes that line the top and sides of Web sites – as well as radio and television spots to drive traffic to their Web sites. In November 1997, the Interactive Advertising Bureau (IAB) announced that it would donate 5 percent of its ad inventory to PSAs. And the Ad Council recently reported approximately \$391 million in donated advertising space generated from online placements alone last year – an increase of 500 percent from the year before.

The Coalition for Organ Donation, which has collaborated with the Ad Council, says it is pleased with the amount of traffic their banner ads are driving to its Web site. In May, an estimated 6,000 of the 109,000 visitors to the Coalition’s site arrived by clicking on banner ads appearing on such disparate general-interest Web sites as the Onion, the Wedding Channel, and Geocities, Spieldenner says.

Last year, the Coalition, which first began working with the Ad Council in 1994, added online PSAs to its mix of traditional media messages. The Ad Council distributes the Coalition’s online PSAs to Web ad servers such as Doubleclick and Flycast. “Companies know they can go to the Ad Council to get these banner ads, so there’s a higher chance of us getting our PSAs placed online this way,” Spieldenner says. Still, he says he worries about the arbitrary nature of PSA placement. “How do companies choose us over some other organization? I’m not sure. Sometimes I think it may be how important the Webmaster thinks our issue is,” Spieldenner adds.

Of course, there’s no guarantee that anyone, let alone the right audience will see an online PSA campaign. According to Turow: “The problem on the Web is similar to the problems in the traditional media. PSAs are being put up on the Web helter-skelter.” As a result, the Ad Council increasingly has focused its attention on building relationships with leading Internet distributors who provide the space and have the ability to target the messages. Additionally, some of the major players on the Internet are beginning to establish policies about their public service commitments and dedicate staff to manage those programs. For example, the AOL Time Warner Foundation now has a staff member who is specifically responsible for online PSAs.

But compared with traditional broadcasters, who are required by the Federal Communications Commission to set aside airtime to serve the public interest, there is no corresponding system for online PSAs.

Doubleclick Inc., one of the leading ad-server companies, receives 16 to 20 requests every month to run online PSAs, and commits to run each campaign chosen for one month, according to spokesperson Jennifer Blum. The number of times the chosen online PSA runs each month can fluctuate: for example, in June 2000 Doubleclick ran 3.2 million PSA impressions, while the following month it ran 124 million impressions. So far this year Doubleclick is averaging approximately 200 million PSA impressions per month, Blum says.

Last year, America Online, which with Yahoo! accounts for almost half the advertising on the Internet, estimates it ran about \$25 million worth of online PSAs. According to Jenn Thompson, a director at the AOL Time Warner Foundation who is responsible for online PSAs, AOL provides space to between 10 and 15 campaigns per month resulting in anywhere from a couple thousand to several million impressions. However, citing one of the common problems with public service advertising – online or on-air – Thompson explains that the PSAs AOL provides space to generally appear “at random, wherever there is unsold ad inventory.”

While it is estimated that more than 50 percent of U.S. households are now online, some groups are better targets on the Internet than others, according to Jim Margolis, senior partner with Greer, Margolis, Mitchell, Burns and Associates, a Washington-based communications firm that has conducted numerous public service campaigns. “I can run an AmeriCorps PSA online because its target is young and Internet-savvy. But would I go online with a campaign designed to get low-income families enrolled in subsidized health care programs? Probably not,” Margolis says. That, of course, ties into a larger problem. Today, the growth in Internet use is strongest among urban populations and those Americans with more than a high school education, meaning that many rural, poor, and minority communities – the very groups PSAs are often trying to reach – are still underrepresented in the online audiences.

Right now, measuring the impact of online PSAs is also challenging. Banner ads, for instance, are billed on a CPM, or cost per thousand, basis, which indicates the number of times an ad was downloaded onto a computer screen. This measurement supposedly indicates how many individual viewers saw the ad, but it’s impossible to be sure whether 1,000 “impressions” results from 1,000 separate individuals looking at the ad or 100 individuals each looking at the ad 10 times. While many say this is irrelevant, noting that repetition has always been critical in advertising, the fact remains that audience measurement is still a relatively clumsy affair on the Internet, especially for those without big budgets for tracking and monitoring.

“It’s very vogue now to pooh-pooh the effectiveness of banner ads on the Internet,” says the Ad Council’s Peggy Conlon, “but we can certainly demonstrate that they have driven traffic to sites for more information.” She adds, “I think as time goes by we’ll be able to survey these populations, get a baseline of certain attitudes and behaviors, and demonstrate that this medium is just as effective as the other more traditional media in getting the message across.” Yet while some Web sites have mechanisms in place to measure the size of their audiences, often PSA campaigns don’t know whom they are reaching, let alone whether behavior or attitudes have changed as a result.

Additionally, cyberspace is still rocky territory for the creative people who design online ads. Banner ads have obvious design limitations. Even the most talented and dedicated graphic artist can be hard pushed to design a grab-the-gut image that fits into a space less than three inches long and one inch wide and that can operate on outdated as well as state-of-the-art software. Jan Leth, Ogilvy Interactive’s senior creative partner, puts it a little more bluntly in *eCompany*: “The creative in most banner ads suck.”

In fact, much of the blame for the current poor performance of online ads, analysts say, should be directed at banner ads. When they first appeared in 1994, banner ads were wildly successful, enticing at least 10 percent of the visitors to a site like Yahoo! to “click-through” to an advertiser’s site. Today, even though banner ads now account for half of all the money spent on Internet advertising, the average click-through rate is closer to 0.5 percent. When it comes to the quality of the creative, it should come as no surprise that the Internet is showing a learning curve, just as television did in its earlier years, or that PSAs, which have far less money spent on them than traditional advertisements, are lagging even further behind.

In an effort to resuscitate the flagging online ad industry, the IAB issued new, voluntary standards for larger banner ads February 26. Advertisers now have room to add interactivity and an “emotional element” designed to give banner ads some of the punch of television commercials – characteristics that are especially important for PSAs. Some are also experimenting with a certain kind of pop-up ad called a “supersticial” that features 20-second animation to capture the attention of the audience. It should be noted, however, that few Americans have home computers capable of downloading huge graphics files, so the high-resolution photography that could make online PSAs more appealing may not be visible on the majority of computer screens.

Many believe that the Internet holds the potential to allow advertisers to deliver public service messages in a much more cost-effective manner. It doesn’t cost any more money for a Web publisher to put up three ads than one ad, according to Robbin Zeff, author of *The Nonprofit Guide to the Internet: How to Survive and Thrive*.<sup>4</sup> The lagging commercial ad market online is also a boost, she points out. “I’m telling all my clients rights now that this is the time to do PSAs, because there’s lots of unused ad inventory out there. And it’s in the best interest of these Web sites to look like they have a lot of ads running.”

The Internet and other new interactive mediums don't yet offer the same massive audiences as traditional broadcast technologies, however. Campaign officials at People for the Ethical Treatment of Animals (PETA), for example, say they put their newest PSA, aimed at convincing cat owners to neuter or spay their pets, on the Internet after broadcasters turned it down earlier this year because it was too controversial. "While you get more people seeing [an Internet ad] over time – which is a great thing – you also don't get that instant 'Kaboom!' that you do when something's broadcast in the middle of the Super Bowl," Nicholas Racz, an independent film director who helped create PETA's PSA, admitted.

At the same time that advancing communication technologies offer new opportunities to reach audiences, they also pose some potential roadblocks to the success of online public service advertising. In the past three years, more than six million people have downloaded free versions of software programs that go by such names as "AdSubtract" or "AdKiller" and block online ads from view whenever a Web page loads on a computer screen. Similarly, interactive television and new digital video recorders such as TiVo and Replay TV enable viewers to skip through commercials, including PSAs. Zeff thinks concerns that new technologies will kill off PSA audiences are overblown. "People have been fast-forwarding or getting up and going off the kitchen during commercials for a long time. With every new technology, people think we're re-creating the world, and we're just not." Others say that as technologies like TiVo and Replay TV build a market, advertisers will simply move to programming to get out their messages. Already today product placements in movies and on television for commercial products, like Coca-Cola or BMW, are big business. Similarly, public health organizations also work with the

entertainment industry to incorporate portrayals of health and social issues into programming. Many say this approach may be ultimately more effective in changing public behavior. One recent study by the Kaiser Family Foundation of regular viewers of the television show *ER*, for example, found that knowledge about a particular sexually transmitted disease tripled immediately after the show addressed the topic.<sup>5</sup>

What seems to be cause for greater concern among consumer interest groups, however, is the potential of these new interactive mediums to reveal the personal behaviors of their audience. Internet advertisers, for example, can monitor which of their Web pages are browsed by viewers and how long they stay on each page, as well as report how often purchases are made at the end of that process. That may be troubling to people buying camping equipment, or even cars, online. But it can be terrifying to a person who needs information about a domestic violence shelter or a rape crisis center. "If people feel they can't come anonymously to a place that has sensitive information, then they're not going to use the services that place offers," says Ari Schwartz, a senior policy analyst for the Center for Democracy and Technology.

The reality is that databases that result from such "data mining" activities have become key to successful marketing on the Web, advertisers say. At the same time, public concern over the invasion of consumer privacy has prompted a number of congressional measures aimed at establishing federal guidelines to control the commercial use of personal information.

After a four-month study of TiVo's technology, the nonprofit Privacy Foundation and the University of Denver Privacy Center concluded that TiVo "gathers enough information to track individual users' home viewing habits while apparently promising not to do so" and "could identify the personal viewing habits of subscribers at will."<sup>6</sup>

"Even within interactive TV...most content is served over a private network. But nevertheless, all that information can be used for purposes that aren't appropriate. Everyone's aware of that," says Andy Beers, group business development manager for the Microsoft TV group, Microsoft Corporation's venture into ITV programming. To soothe subscribers' qualms, Beers says, the cable television and telecommunications companies providing broadcast signals for ITV can offer the options of viewing advertising either on an "opt-in" basis, where the viewer agrees to provide personal data in return for access to an ad, or on the basis of "anonymous targeting," where the set-top box that controls the broadcast signal is electronically programmed not to report the subscriber's viewing habits back to the broadcaster's computer.

On the other hand, better targeting offers many advantages for PSA campaigns, which want to reach the audiences most in need of hearing their messages. A PSA about child care might be placed on parenting Web sites, or sites that sell baby clothes, for example. Even more important, experts say, is the kind of helpful information that can be exchanged in a matter of seconds. "One of the benefits for public service advertisers is that, for the very first time, we can...facilitate a more powerful one-to-one relationship that might include informational video updates and calls to action in full screen, full motion, full resolution video," notes Stacy Jolna, TiVo's chief programming officer and vice president of media partnerships.

No matter what, PSAs will have to become much more media-savvy in order to thrive in this new environment, some makers of the new technologies warn. "The world changes when you give consumers complete control over what they're watching. It places more of an onus on the shoulders of the producers to make that content more compelling, so that viewers will actually watch it, pay attention, and respond to calls to action," notes Jolna.

Nonprofits also may have to look for opportunities to ensure that their messages are played on demand, rather than being automatically sandwiched inside a program. Possibilities include messages that automatically run across the television screen while it sits idle, or that come already loaded on a new ITV set's hard drive, or that offer viewers a series of buttons that bring up a Web site, launch a video, or give them a chance to request more information. According to Kirsten Jansen, vice president of strategic relations for Cylo, an interactive TV strategy and development company in New York: "The opportunity for PSAs offered by those two things – increased presence and the ability to interact immediately with the click of a button – is huge."

Yet, some advocates worry that the obligation to serve the public that motivates traditional broadcasters to donate airtime to PSAs won't translate fully into the emerging media. The federal government regulates programming on broadcast TV because of the limited broadcast spectrum. But what happens with interactive TV, where the bulk of the programming comes from cable companies and Internet content providers, neither of which is governed by the same rules about what they offer audiences? And when TVs start providing Internet and other nonbroadcast services, who controls the content, including PSAs? Cable companies don't have to share access to their networks. So can a cable operator refuse to air a PSA that carries a message the operator doesn't like? Are these areas that warrant regulation? And what will all these changes mean for PSAs, especially as media power continues to be concentrated in fewer and fewer hands?

Keith Fulton, vice president of the AOL-Time Warner Foundation, believes that mergers between major media companies will actually boost the power of PSA campaigns because they can be promoted across many mediums. But others are more skeptical. Nonprofit Internet advisor Robbin Zeff cautions that, as these mergers concentrate decision-making about when to donate airtime or ad space, only the major advertising agencies will have the clout to get through to them with donation requests. "As these mergers take place PSAs will become much more formalized," she says. "A controversial issue probably won't be supported by the Ad Council. Look at what they choose now. They tend to be pretty vanilla issues."

Some advocates see even bigger problems. "In place of an open network, media conglomerates are spending billions to create what they call 'walled gardens,' but which are really new forms of electronic enclosures designed to ensure their continued dominance of the media system," explains Jeff Chester, executive director of the Center for Digital Democracy, in a recent letter about a conference on the future of broadband communications.<sup>7</sup> "Unless we act soon, nonprofit organizations will find it increasingly difficult to operate in an online environment that favors big business over small, e-commerce over e-democracy, and public relations over public service," he adds.

Still, there is no turning back the clock. According to Chester, when less than 20 percent of the public will get digital TV from over-the-air sources in the future, those who care about PSAs need to look carefully at where TV is going and develop strategies with the cable and satellite operators who control the two-way signal.

The Ad Council's Peggy Conlon agrees. "We are going to have to figure out how to compete for attention in this new marketplace. Just as paid advertisers have to compete. The universe is not going to change to suit us, we're going to have to figure out how to do business in the new media marketplace."

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#### ENDNOTES

- <sup>1</sup> National Science Foundation, *Science and Engineering Indicators – 2000*, available at <http://www.nsf.gov/sbe/srs/seind00/frames.htm>.
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- <sup>6</sup> David Martin, "TiVo's Data Collection and Privacy Practices," (Denver: The Privacy Foundation, March 26, 2001), available at <http://www.privacy-foundation.org/privacywatch/introduction>.
- <sup>7</sup> Available at <http://www.cme.org/access/press/010509conf.html>.

# THE IMPACT OF PUBLIC SERVICE ADVERTISING

By Charles Atkin and Laura Schiller

Over the past six decades, thousands of mass media campaigns have featured public service advertisements (PSAs) asking Americans to prevent forest fires, refrain from smoking, curb violence, talk with children, pick up trash, get off drugs, and everything else in between. Regardless of the message, there is one inevitable question that is asked by almost everyone who considers launching or supporting a PSA campaign: “Do they work?” And the even more inevitable answer is: “It depends.” It depends upon whether the goal of the campaign plays to the advantages of the mass media, who the members of the target audience are, how well the creative “speaks” to them, how much exposure the message receives in the media, and how well the PSA is supplemented by other efforts.

The elusive ideal in public education campaigns is the magic bullet, where the right message is sent through the right channels to the right target with impressive results. Lawrence Wallack, a professor of public health at the University of California at Berkeley, refers to this scenario as the “media fantasy.”<sup>1</sup> And with good reason. A review of more than 100 public service campaigns launched over the past decade indicates a wide range of results: some seem to achieve relatively high levels of success, others do not appear to register any effect at all, and most yield minimal to moderate results.\*

While this conclusion – that, under the right conditions, PSA campaigns can have real, if limited, effects – is widely accepted, it is hardly universal or long-standing. Since public service campaigns first hit the airwaves almost 60 years ago, there have been shifting opinions and heated debates about the role that PSAs can play in tackling our most pressing social issues. In the first years of public service advertising, audiences were inundated with messages supporting the World War II effort, including such classics as “Loose Lips Sink Ships,” and many social scientists at the time were convinced that these new campaigns could have a powerful influence. Over the next decades, despite the reported success of Smokey Bear and other celebrated PSAs, more skeptics started raising their voices, and articles came out with titles such as “Some Reasons Why Information Campaigns Fail.”<sup>2</sup>

That question was turned on its head almost 25 years later by another researcher who, in his own article, outlined “Some Reasons Why Information Campaigns Can Succeed,”<sup>3</sup> reflecting a growing consensus about the ability of PSA campaigns to achieve certain types of results. It was during that time that the Stanford Three Community study showed that an intensive media campaign, when combined with other efforts, could help reduce cholesterol levels, blood pressure, smoking, and other risk factors for heart disease.<sup>4</sup> The Stanford project “has been among the most successful communication campaigns,” notes Everett Rogers, the Regents professor of communication and journalism at the

\*This literature review is part of a more comprehensive paper on the effectiveness of PSA campaigns, “The Impact of Public Service Advertising: Research Evidence and Effective Strategies,” which was prepared by Charles Atkin for the Kaiser Family Foundation and is available at [www.kff.org](http://www.kff.org).

University of New Mexico. “Why? It was financially well endowed, intensive, and multiphased over a long time period; it used formative evaluation, utilized the mass media efficiently to initiate interpersonal communication, was very daring and original in its concepts and implementation, and was run by a very prestigious organization; and skilled people from different disciplines were integrated in a team effort. Unfortunately, all these conditions are seldom found in other media campaigns.”<sup>5</sup>

Of course, there is one big problem with resolving ongoing debates about the effectiveness of PSA campaigns. While social science research in this area has progressed in scope and sophistication over the years, it remains sparse and rarely definitive. For one, post-campaign evaluations like the one done at Stanford can be prohibitively expensive, especially for non-profits which often struggle to afford the cost of producing their PSAs in the first place. It’s also challenging to accurately measure the effects of a public service campaign. When evaluating these efforts, it’s often impossible to control who sees the ads, because decisions about when they run are usually made by stations donating the airtime. Changes often evolve slowly or happen indirectly, in part because of new laws that are passed or other shifts in the social environment. Moreover, these campaigns often have many different facets – including policy initiatives, classroom education, physician recommendations, media coverage, and grassroots advocacy – which makes it harder to isolate the impact of public service advertising alone.

When PSAs are examined by themselves, unless the evaluations are comprehensive, the results still may only tell part of the story. Focus group research, for example, can help shape and test a message before the campaign launches, but, in the end, these sessions can’t measure whether the public’s attitudes or behaviors have actually changed. Likewise, analysis of data bases – for example comparing changes in attitudes or behaviors to how many times an ad played – won’t shed any light on how the quality of the message might have influenced a campaign’s eventual success or failure.

Indeed, even the very definition of success is open to wide interpretation in a PSA campaign. Most commercial advertisers seek to create brand images or shift brand preferences, and, because of the sheer size of the market, even a small change in buying patterns is usually enough to make a lot of money for a given company. While it’s tough for even commercial advertisers to measure their results precisely, getting people to buy Coke over Pepsi is very different from changing their attitudes and behaviors concerning drugs, alcohol, teen pregnancy, and other complicated social problems. “Different people have different definitions of ‘success’ for mass media health campaigns,” explains Warren Ashley, former chairman of the Entertainment Industry Coalition on AIDS. “In fact, defining success is often quite problematic. Is it the number of public service announcements produced, the number of times automobile seat belts are worn on the television screen, use or nonuse of alcohol on the television screen, the change in attitudes of the viewers, or the actual behavior change of the viewers?”<sup>6</sup> Indeed, when PSA campaigns are countering the impact of wealthy adversaries, such as tobacco companies, even maintaining the status quo might be viewed by some as a success.

Defining and measuring success has become even more complicated as the media landscape continues to shift. When Smokey Bear made his debut, he could reach most Americans by appearing on three broadcast channels. While today’s splintered media market makes it much tougher to move an issue onto everyone’s agenda, it is now possible to target segments of the population. There is also the question of the impact of a PSA campaign purchasing airtime, rather than relying on donated time from broadcasters. “Whereas commercial advertisers ‘pay’ for space and hence are guaranteed control of the placement and timing of their messages in the

media,” explain Charles Salmon and Lisa Murray-Johnson, professors at Michigan State University, “publicity agents and public service campaigners are said to ‘pray’ for space.”<sup>7</sup> No doubt, there is still a lot of praying going on when PSAs are sent to stations, but there have been more exceptions to that rule in recent years, most notably the efforts by the White House Office of Drug Control Policy, which is spending \$1 billion to steer young people away from drugs, and by states such as Florida, Massachusetts, and California, which have invested millions in successful antismoking campaigns. When trying to determine what works, how do researchers compare the effectiveness of these paid PSA efforts with their traditional donated counterparts?

Despite these obvious limitations, however, looking across the literature, some important lessons can be drawn about the characteristics that often define effective public service campaigns today. From the beginning, successful campaigns pick realistic goals that play to the strengths of the mass media, and then select target audiences most likely to help reach those goals. “Usually campaigns do not achieve success because of unrealistic goals,” notes Rogers. “Goals of 40% or 50% changes in human behavior are impossible. More reasonable objectives might be 3-5% change in a reasonable time frame of several years.”<sup>8</sup>

Even these modest goals often require the involvement of the mass media. As far back as 1865, in his *Coming to America*, Alexis de Toqueville predicted that the media would be the best way in this increasingly pluralistic society to unite people in common purpose. He said, “This can only be habitually and conveniently effected by means of a newspaper; nothing but a newspaper can drop the same thought into a thousand minds at the same moment.”<sup>9</sup> Since then, we’ve added radio, television, the Internet, and other emerging mediums to the mix, but the role of the mass media in raising awareness about important topics is just as important today.

While researchers have seldom tested the impact of individual public service spots under realistic field conditions, one such experiment was conducted using television PSAs from the “America Responds to AIDS” campaign. In two TV markets, the spots were played for three nights on the late night newscast of one station. For those who watched the newscasts featuring the AIDS messages, the proportion citing AIDS as an important issue increased from 15 to 24 percent. There were no changes in those who did not see the spots.<sup>10</sup> This kind of campaign plays to the strengths of the mass media, which is more effective in raising awareness than in changing fundamental behavior. Such awareness campaigns can trigger action among already predisposed segments of the population, who may, for example, now be more inclined to avoid a contaminated food product after reading a story about some of its risks. They can foster interpersonal communication about the topic, such as the young minority women who read AIDS messages and were more likely to communicate with a partner about condom use.<sup>11</sup> They can also prompt individuals to find out more information about the issue from in-depth sources such as Web sites, books, counselors, opinion leaders, and 800 numbers. In fact, smoking cessation PSAs often produce a brief spike in calls to telephone helplines.<sup>12</sup>

When campaigns do seek to change behavior, their success often depends on the type of behavior they are attempting to influence. Leslie Snyder, a professor at the University of Connecticut, looked at 48 health campaigns involving more than 168,000 people.<sup>13</sup> She and her colleagues concluded that 7 to 10 percent more people in the communities targeted by the campaigns changed their behavior. However, the effects are more than twice as strong (12%) for adoption of a new behavior such as exercise and dental

care than for stopping a current habit (5%) such as smoking, binge drinking, and risky sex. Those campaigns promoting health services such as cancer screening or hypertension treatment achieved a modest impact (average 7%). A campaign has a higher chance of success when it chooses goals that offer the greatest benefits to people and require the least amount of sacrifice from them, such as stopping littering or buckling a seatbelt. In West Virginia, after a “1% or Less” dietary campaign focused on the simple message of drinking low-fat milk, supermarket purchases of this product more than doubled.<sup>14</sup> On the other hand, the most comprehensive smoking cessation campaign – the COMMIT project, sponsored by the National Cancer Institute – produced only a slightly higher quit rate, which was mostly among light to moderate smokers.<sup>15</sup>

Campaigns can increase their effectiveness by focusing on the audiences most favorably disposed to their messages. For example one of the highest priority targets for the ONDCP’s \$1 billion antidrug campaign is the healthy core of young people who are already resisting drug use, and need positive reinforcement to continue on this path.<sup>16</sup>

Some experts, however, believe that focusing too much on individual behavior puts the onus of responsibility on the “victim,” while deflating attention from the many factors in the environment that foster such behavior. When trying to reach at-risk young people, for example, campaigns may achieve greater results by educating and empowering their coaches, parents, teachers, police officers, friends, siblings, and others in a position to influence them. Moreover, proponents of media advocacy techniques believe that it is necessary to combine community

organizing and media publicity to advance the public policies that can ultimately shape personal behavior.<sup>17</sup> “The key issue is how best to use the mass media to stimulate change in the broader social and political context in which health behavior takes place,” explains Wallack. “This means trying to alter not the behavior of individuals with problems but the behavior of those whose decisions largely determine the information environment in which individuals make health decisions.”<sup>18</sup> This media advocacy strategy relies heavily on agenda setting, a process by which increased media attention to a particular issue shapes the priorities of the public and its policy makers. Consider the case of drunk driving prevention. Amid sustained news media attention and periodic large PSA efforts, the prevalence of drunk driving has decreased substantially over the past two decades. Nevertheless several studies have shown little direct impact of the media on drunk driving behavior.<sup>19</sup> Instead change may have happened indirectly, with the media producing a strong effect on drunk driving legislation during the 1980s and early 1990s, which in turn improved drunk driving practices.<sup>20</sup>

Ironically, one of the most important lessons research into public service campaigns has taught us is that with certain goals the media alone is often insufficient to achieve substantial results. In the Stanford heart disease campaign, the best results were found in the community that used both the media and other tactics. More than two decades later, the same lesson was clear in the MPowerment Project, an HIV prevention campaign attempting to change risky behaviors among young gay men.<sup>21</sup> While there was a small publicity campaign, the primary intervention focused on outreach by young gay men themselves, who encouraged their peers to engage in safer sex and to participate in social and educational programs. Following the eight-month project, the proportion of men engaging in sex with non-primary partners decreased almost by 50 percent.

Once a campaign has identified a target audience, it is critical that it develops messages that most effectively “speak” to the group. “If I could give them [PSA campaigns] any advice, it would be, number one: do what you’re doing very, very well,” notes Peggy Conlon, the president and CEO of the Ad Council. “Execute your messages and your creative and make sure you have the highest quality that you can possibly deliver when it comes to the PSA model itself, because that will help you compete.”<sup>22</sup> That means, first and foremost, understanding the audience. “Those who develop mass media health campaigns often do not really understand their audiences,” says Robert Hornik, the Wilbur Schramm Professor of Communication and Health Policy at the University of Pennsylvania’s Annenberg School for Communication. “Many times creative people get together and decide that they have a great way of reaching a particular target audience. Sometimes they are right, but often what they are doing may not be responsive to the target audience’s needs and interests, and, if so, the campaign will fail.”<sup>23</sup>

In the early stages of campaign development, designers can increase their chances of success by collecting background information about what members of the audience already think and know, how they get their information, what kinds of messages they prefer, and how they react to different kinds of messengers and appeals.<sup>24</sup> As campaigns refine their message concepts and begin developing their initial creative, focus groups comprised of the target audience can provide qualitative reactions, and message-testing labs can give more quantitative ratings. Getting this kind of pretesting feedback before final production can be essential to finding out if the message is working, not to mention helping to resolve the inevitable differences of opinion between policy experts and creative professionals. The fact is, what works in one campaign may backfire in another. In pre- and postproduction testing, campaigns may find out that the clever creative, while potentially award winning, doesn’t register at all with

their audience. Or alternatively, that the perspective of the experts doesn’t translate into messages that resonate with the average viewer. They may find out that a credible spokesperson for one issue is a liability for another. A doctor may communicate trust and expertise in one campaign, and be perceived as boring in another. Sometimes a victim may be compelling in one instance, but damaging in another. For example, according to Jim Margolis, senior partner at Greer, Margolis, Mitchell, Burns and Associates, a communications firm in Washington, D.C. that has conducted many public education campaigns, in an antidrug campaign, it may be more effective having a third party, instead of the first person, tell the stories of substance abusers because viewers may blame them for their fate, and therefore not find them sympathetic. In this case, Margolis says, “letting someone else paint the picture may be more impactful.”<sup>25</sup>

In some circumstances, celebrities from the entertainment or sports worlds can attract attention to otherwise dull or distressing topics. The “I am Your Child” campaign was intended to educate the public about the importance of early brain development, a task made much easier by its spokesperson, director Rob Reiner. Reiner was able to get ABC to run a one-hour, prime-time special on the topic. *Good Morning America* did a week-long series. *Newsweek* put brain research on its cover. “With the exposure of Rob Reiner, [campaign officials] were able to move this issue light years ahead of where it would have been,” notes Elizabeth Burke Bryant, the executive director of Rhode Island Kids Count. “They were able to give it panache and style in a way that national research studies usually don’t do.”<sup>26</sup>

While celebrities are often seen as trustworthy, they are much more effective when they have personal experience with the issue – whether it’s basketball star Magic Johnson speaking out about AIDS or singer Barbara Mandrell talking about safe driving. “Celebrities are most effective when their life experience is somehow connected to the message you’re trying to communicate,” says Margolis. “If you had someone who grew up poor, couldn’t afford health care as a child, and is now speaking about why it’s important to enroll kids in CHIP (the Children’s Health Insurance Program), that has substantial meaning. On the other hand, if it’s ‘I’m not a doctor, but I play one on TV,’ they may capture attention, but audiences also may start thinking, ‘why am I listening to this person if he has no experience with the problem.’”<sup>27</sup>

It should be noted that when a campaign is closely associated with celebrities, it can rise or fall with their reputations. “It is a problem these days to find role models who are untainted by scandal,” notes Marcy Kelly, former president of Mediascope, which has produced PSA campaigns. “It is even more difficult to find role models who will likely remain trouble free. There are not many people who teenagers respect and look up to as heroes, and sometimes these people’s images are in conflict with the desired health message.”<sup>28</sup> Many networks use their own on-air celebrities for their PSA campaigns, arguing that they are both attention-grabbing and effective spokespersons for these topics. Critics of this trend counter that these ads are more about promoting the network than educating the public. Similar questions arise when the messenger is not a person, but a corporation or other institution. When alcohol and tobacco companies, for example, sponsor messages about underage smoking or drinking, they can gain some credibility by appearing to argue against their own self-interest. However, audiences may also be suspicious of a company’s underlying motives. Researchers found that brewer ads promoting alcohol moderation or warning about drunk driving were primarily perceived by youthful audiences as self-serving attempts to enhance the company image by appearing to address the problem. Moreover, while the messages did make a minor contribu-

tion to learning about drinking-related problems, audiences also perceived them as having pro-drinking themes.<sup>29</sup> This can be a problem for the government as well. “For example, in the case of the interrelation of drug abuse and AIDS, the U.S. government lacks credibility with drug addicts,” notes Rogers. “It seems unlikely that these individuals will now perceive the federal government as their ‘helpful friend.’”<sup>30</sup>

Another question facing PSA campaigns is what kinds of appeals to use. The best campaigns use a variety of appeals, both positive and negative. Recently, when researchers looked at dozens of studies examining messages about health risks, they found that, in general, stronger fear appeals are more effective than milder ones in changing attitudes and behaviors.<sup>31</sup> Still, there is much controversy about fear tactics. “Fear appeals can be effective in a health campaign if an appropriate *outlet* for the fear is then provided as part of the campaign activities,” acknowledges David McCallum, former deputy director of the Center for Risk Communication at Columbia University. “In general, we should be very careful when using fear appeals because they often have negative outcomes.”<sup>32</sup> Such appeals can backfire when the descriptions are overly vivid and severe – disfigured crash victims, smokers with black lungs, skeletal AIDS patients. Exaggerated claims can also undermine the credibility of the messenger, or altogether desensitize audiences. What’s more, researchers have consistently found that using fear appeals is not effective without an “efficacy” component; that is, unless audience members are given advice about how to reduce the danger, and the confidence that they can do so.<sup>33</sup> “The key to effective fear appeals is that they should not develop a high level of anxiety,” explains Wallack. “A quick, accessible outlet also should be provided for the resolution of the anxiety or to reduce fear,” he notes, giving the example of AIDS campaigns that combine fear appeals with messages about safe sex.<sup>34</sup>

In general, the most effective creative appeals cater specifically to the characteristics of the target audience. In the case of fear appeals, fear of death and injury are not as effective with young people as fear of rejection, fear of social embarrassment, and fear of getting caught by parents. “Teenagers are not concerned with long-term health effects,” explains Kelly. “They are more concerned about short-term and immediate effects. They worry about bad breath or yellow fingers from smoking rather than about lung cancer at the age of 50.”<sup>35</sup> Formative research can shed light on the most effective types of appeals for a given population. In the 1990s, as concern over school shootings and other forms of youth violence grew, public service spots on the topic appeared on the major broadcast networks, as well as youth-oriented cable channels such as MTV, Nickelodeon, and HBO. In 1999, Borzekowski and Poussaint showed four of these antiviolenence TV spots – “Stray Bullet” (HBO/Warner), “Boy Rapper” (MTV), “Good Kids” (HBO/Warner), and “Clinton” (Ad Council) – to samples of urban, suburban, and rural teenagers, and measured the results. The reactions to the messages were varied, depending upon factors such as gender, ethnicity, geography, knowledge, attitudes, and experiences with violence, reinforcing the importance of carefully adjusting the content and style of messages to their target audiences.<sup>36</sup> That is what many antidrug campaigns have tried to do. Some researchers point out that young people who have a high need for sensation and arousal in their lives are much more likely not only to use drugs, but also to prefer highly stimulating TV messages with novel formats, extreme close-ups, frequent editing cuts, fast-paced movement, sound effects, intense music, and suspenseful dramatic portrayals.<sup>37</sup>

In the end, however, it doesn’t matter how perfect the message is if it never reaches the audience. “Audience bombardment is the key to a successful media campaign,” notes Jacqueline McDonald, former president of the Scott Newman Center in Los Angeles, which uses the media for its drug-prevention efforts. “This means using all the media avenues available over an extended period of time, and coordinating the various channels in as many ways as possible.”<sup>38</sup> So, how much is enough? Again, it depends. As a general rule, it might only take seeing a message a few times before the most receptive people can recognize the catchiest slogan, or learn a new fact, or perform a relatively easy task. However, if a public service campaign wants to achieve the same effect with half of the audience members, the message probably needs to reach them about 10 times. Advertisers measure this kind of exposure in gross rating points. A hundred points means that 100 percent of your target audience has seen that one message one time. According to Margolis, while there is a lot of variation depending on the goals of the campaign, on average, “[A person] needs to hear the message between eight-11 times to have it register.”<sup>39</sup>

With changes that are harder to achieve – moving beyond basic education to reducing marijuana use, for example – even a saturation level of more than 100 exposures every year may not elicit dramatic changes. As a general rule, the more an audience sees or hears a message, the better the results. However, after a certain amount of exposure, the campaign can reach the point of diminishing returns. Some of that is because, by that time, it is focusing on the people who are the hardest to reach and motivate. Additionally, the message itself starts to wear out, making it important for campaigns to have a variety of themes and appeals. In fact, often a large number of messages never reach their intended audience, because that audience is distracted or, in this era of fragmented media, isn’t watching a particular channel at all. While Smokey Bear and his contemporaries could reach mass audiences by appearing on just three networks, today it’s rare for any media vehicle to be able to reach more than 10 to 20 percent of the public on a given day.

Trying to reach the target audience with any great frequency is especially challenging for PSA campaigns, which usually have no control over when their donated messages will play, or if they will play at all. That problem has led some campaigns to start buying airtime in recent years, in order to have more control over the frequency and placement of their messages. Thus far, some of these efforts, not surprisingly, have led to impressive results. One review of anti-tobacco media campaigns concluded that in three states where paid PSAs were given heavy media exposure not only did they help raise awareness, they also reduced teen smoking, in part because they helped spur policy initiatives such as increased tobacco taxes.<sup>40</sup> In Florida, initial reports of the well-funded “truth” campaign showed that it had helped decrease youth smoking by 19 percent.<sup>41</sup> Adolescents exposed to the Massachusetts paid PSAs were half as likely to have taken up smoking.<sup>42</sup> In California, after the state spent \$26 million in the early 1990s, primarily for paid TV and radio spots and outdoor ads, half of the young people and two-fifths of the adults could recall one of more of the TV PSAs.<sup>43</sup> This media campaign led to a 2 to 3 percent decrease in cigarette sales, an estimated reduction of 232 million packs over a two-and-a-half-year period or a 7.7 pack reduction per capita for every \$1 spent on the messages.<sup>44</sup>

For both financial and strategic reasons, some groups are turning to new approaches to reach their audiences with public education messages. One such model involves forging direct partnerships with media outlets. Such arrangements allow nonprofits to create messages for a unique target audience and to negotiate a commitment from the networks to air them frequently and during periods of high viewership. The Kaiser Family Foundation, for example, has conducted safer sex PSA campaigns in partnerships with MTV and BET for a number of years. Messages developed jointly by the

networks and the Foundation have generated millions of calls to toll-free hotlines providing free materials and referrals and visits to Web sites from those seeking additional information. A survey of callers to the MTV campaign hotline found that six in 10 (61%) young people had talked to a partner about a sexual health issue; 18 percent reported getting tested for HIV or another STD; 16 percent had visited a health care provider; and 15 percent began using birth control or switched methods because of the campaign with MTV.<sup>45</sup>

In an effort to increase earned media, and thereby get their message out in a more cost-effective way, campaign publicists may feed story ideas to journalists, use celebrity spokespersons or survivors who are likely to get more press attention, or capitalize on the news of the day. That was certainly the case with the Family Violence Prevention Fund’s campaign against domestic violence, which was released, to great attention, during the O.J. Simpson trial. That campaign’s ads, created in partnership with the Ad Council, were played 14,000 times during the first four months, which compares with the Ad Council average of 1,100 times per month.<sup>46</sup> “Unfortunately, an important factor in a campaign’s success is how exciting or how “hot” the topic is in the media’s eyes and in public opinion,” notes Elaine Bractic Arkin, an expert on health communication and social marketing programs. “So the timing of the campaign is important: A campaign has to be implemented at the right time, by the right people, having the right connections.”<sup>47</sup>

In the past decade, more campaigns also have taken a page from the product placement rule book and, instead of putting cars or sodas into entertainment programming, they are embedding messages about safe sex, conflict resolution, designated drivers, and other similar topics – often with substantial success. The entertainment-education model itself isn’t new. It began in Peru in 1951, where the Soap Opera, the *Archers*, tried to educate the public about agricultural development. In 1969 another soap opera, *Simplemente Maria*, showed how a migrant, Maria, became successful by working during the day, taking adult literacy classes at night, and using a Singer

sewing machine. In the aftermath, there was a dramatic increase in the number of girls taking literacy classes, not to mention in the sale of Singer sewing machines.<sup>48</sup> In this country, Norman Lear used his program, *Maude*, to explore the difficult issue of abortion in the early 1970s. And the sitcom *Happy Days* took on literacy. “When Henry Winkler of *Happy Days* took out a library card, the next day U.S. libraries got thousands of requests for library cards,” remembers writer, director, and producer Fern Field Brooks. “We have to look for media messages that groups of people are really susceptible to, as Henry Winkler’s behavior seemed to have an impact on American teenagers.”<sup>49</sup>

These days, foundations, governments, nonprofits, and others are all getting into the act. In June, the *New York Times* published a story about the Centers for Disease Control and Prevention’s (CDC) efforts to put “positive health messages” into television shows.<sup>50</sup> In a segment of *Beverly Hills 90210*, one of the characters, Steve, is bragging about his tan, when his girlfriend points out a troubling mole on his neck. He takes to the beach with a megaphone to tell his peers to use sunscreen to avoid skin cancer. “We thought *90210* was a great opportunity to not only reach young adults, but also the teens who idolize those young adults,” explains Dr. Cynthia Jorgensen, who runs the CDC’s cancer education campaigns.<sup>51</sup>

Proponents of this tactic point out that people watching TV develop relationships with characters, and often trust their advice more than an unknown spokesperson for a PSA campaign. These kinds of messages are very inexpensive to produce for nonprofits, because virtually all the costs stem from the time spent working with the programming outlets. In fact, some think nonprofits should look at developing entire programs themselves. “We must find ways to finance the production of films like *Stand and Deliver*, which cost only about \$1 million,” explains Kelly. “This movie was much more effective in keeping kids in school than 10 PSAs saying, ‘Stay in school.’”<sup>52</sup>

Still, there are some drawbacks to the overall entertainment-education model. It’s easier to address some topics than others. It’s often easier, for example, to insert a line about skin cancer, or even designated drivers – “So, who’s going to be the designated driver tonight?” – than it is to devote a large portion of an episode to a topic such as AIDS.<sup>53</sup> In addition, some are troubled by the blurring of lines between policy and entertainment, especially when the government is involved. Moreover, few shows have the reach of a *Beverly Hills 90210* or an *ER*, which makes ensuring and measuring success much more difficult.

Even so, some studies are showing the effectiveness of this approach. For many years, daytime soap operas such as *All My Children* and *General Hospital* have included health-related issues such as AIDS, diabetes, and bone marrow testing into their storylines. The *New York Times* article notes that “a 1999 survey by Porter Novelli...found that 48 percent of the people who watched soap operas at least twice a week learned something about diseases and how to prevent them.”<sup>54</sup> The results were similar for a study published this past January by the Kaiser Family Foundation, which evaluated the effects of information about emergency contraception and human papilloma virus (HPV) being discussed by characters in the television drama *ER*. After watching the show that included references to HPV, awareness about this sexually transmitted disease among audience members tripled.<sup>55</sup> In another episode, a patient who has been the victim of date rape explains that she’s heard there are some pills she can take after unprotected sex that will reduce her chance of becoming pregnant. Her entire story lasts three minutes, and her discussions about using birth control pills for emergency contraception last approximately 20 seconds. Among viewers, awareness of emergency contraception increased by 17 percentage points in the week after the episode, but had returned to its previous levels within two months – rein-

forcing the importance of message repetition over time and across channels of communication.<sup>56</sup> The producers of many such programs believe including these messages is important. “This whole thing about how we are only here to entertain, that drives me nuts,” says Dr. Neal Baer, a pediatrician, former producer of *ER* and co-author of the Kaiser Family Foundation study. “We know that people see things on TV that are related to health, and they are going to be affected by it.”<sup>57</sup> But when it comes to PSAs, the nagging question for their sponsors continues to be: just how will people be affected?

Over the past half century, research by social scientists, public health officials, and advertisers has shed light on some key characteristics of effective public health campaigns, and in so doing, influenced their evolution and, hopefully, their success.<sup>58</sup> While the “magic bullet” is still just a fantasy as far as PSAs are concerned, research has reinforced the importance of identifying realistic goals, receptive audiences, and effective messages – and then exhausting every possible media channel to make sure those messages reach members of the target audience enough times. Research has shown how to play to the strengths of the mass media, which can have a significant impact in raising awareness or imparting new knowledge. At the same time, increasingly, such studies have pointed to ways that campaigns also can use the media to reach policy makers and other influential individuals who can alter the entire environment, as well as to energize the campaign’s supplemental programs and policies, which in some cases can be more effective.

However, if public education campaigns are going to achieve success in this increasingly crowded and segmented media landscape, much more research is needed. While individual campaigns often conduct research that spotlights what worked for

them, that information is seldom shared, or even directly applicable to other efforts. Conversely, most of the published evaluations of public service campaigns provide little useful information about which of its components actually led to the measured impact. The typical field experiment simply compares treatment communities that were part of an entire multifaceted campaign with control communities, which receive nothing at all. This design does not permit an adequate answer to the question that every PSA campaign wants to know before it starts: “What works?”

To answer that question with more confidence and precision in the years ahead, future research must examine, for example, the impact of various quantities of campaign messages. It should seek to pinpoint the minimum volume of messages needed to reach many key goals, and the exact point at which, after much repetition, the returns diminish. There is also a need to find out the optimum mix of appeals. Most campaigns use multiple appeals, but little is known about the most effective combination of positive and negative messages, or the relative impact of fear appeals versus other negative appeals. Then there is the question of whom to target in the first place. As noted, in addition to targeting the individuals campaigns seek to ultimately help, some media efforts are increasingly trying to reach influential people in their lives, and media advocacy approaches are focusing on shifting the priorities of the general public and policy makers. But, as of yet, the best balance among such targets and tactics has yet to be identified.

Finally, more research needs to explore the relative effectiveness of all the emerging mediums, as well as the various ways of disseminating messages within them. We need to compare the cost-effectiveness of paid PSAs to traditional donated public service messages; look at PSAs versus news publicity and entertainment inserts; see how TV compares to not only radio, print, and billboards, but also to Web sites and other new media outlets; and look at how mass communication contrasts with personal outreach.

The world has changed dramatically since messages such as “Loose Lips Sink Ships” and “Only You Can Prevent Forest Fires” first started coming into our living rooms, asking us to take steps to improve our health and lives, our communities and country. The splintering of the media, the cacophony of messages we are increasingly exposed to, the use of new tactics to reach the public, all have given rise to both new opportunities and challenges for PSA campaigns. But whether public service advertising succeeds in this new environment will depend upon the questions we ask, and, even more, on the questions we answer, in the months and years ahead.

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# A CONVERSATION WITH PEGGY CONLON

President and CEO of the Ad Council

**In looking at the new media environment that is before us, what would you say are the most exciting opportunities for public service advertising? What are the greatest challenges?**

I think there are terrific opportunities as new technologies are deployed. We've seen a tremendous growth with the Internet. Our Internet banners went up from calendar year 1999 to calendar year 2000 by 500 percent.

The greatest challenge will continue to be the fragmentation of the audiences. As each new medium comes along, it's additive. And so you didn't have television replacing radio, but you did have it developing its own following and eating into the shares. We saw that when cable companies began to compete with broadcast networks. And, that's going to be the same with all the other new technologies that come along. It's a more challenging job because now you can't reach a 30-percent share of all television viewers with one spot. Those kinds of audiences aren't amassed anymore. So we just have to do business differently.

**How are online public service advertisements (PSAs) faring today? How do we measure their success?**

We valued our dollar support on the Internet just under \$400 million for calendar year 2000. But it's not just that. It's the traffic that we're driving to our campaign sites. If you talk to our more sophisticated campaigns that have sites and they can track where the traffic is coming from, they'll tell you that the number one source of visitors coming to their sites are people who click through on the donated banners that are populating the media right now.

It's very vogue now to pooh-pooh the effectiveness of banner ads on the Internet, but we can certainly demonstrate that they have driven traffic to sites for more information. You don't always know who you are reaching, because it's a self-selecting process by who is interested enough in the topic to click through to the site. [But] it's a good measurement. And, it's certainly what most advertisers will focus on. We'll have to see because we're just now getting a little more sophisticated about how we research the actual impact, and sometimes it's hard to separate that from the effectiveness of changing attitudes and behaviors, which is ultimately the goal.

**We talked about the Internet, but what are some other ways that the Ad Council has responded to these changing times and found new ways to reach the mass audience?**

You have to do it all. What is the best way to reach the mass audience? It's the traditional media – it's television, radio, outdoor, print. The Internet only becomes effective in that its audiences have grown. And fortunately we've grown right along with it. But if you're talking about new technologies like interactive television and wireless technologies, we're experimenting with all of that.

We [also] have a department here that just handles network partnerships. And so we will take our campaigns and work with the networks. We've worked through the years with [NBC's] The More You Know, with CBS, with Fox and ABC.

**Turning to the debate about the increase in the number of paid PSA campaigns such as those from the Office of National Drug Control Policy (ONDCP), what effect do you think that has had on the whole traditional system of donated time?**

I don't think we've seen a measurable decrease in public service advertising as a result of the paid campaigns that are out there right now. We've tried to look at it from several different dimensions and directions, and so far we haven't found any evidence of that. Is that a possibility in the future? Sure, you can't discount it. But it hasn't had an impact yet. And, I think another question that you have to throw into the mix as you think about these things is 'how sustainable is the paid model of PSAs?' You know, there have been a lot of organizations that have said 'we're going to do a lot of fundraising, and we're going to buy our media because we want more control.' They may be able to do that for a year or two, but they can't sustain that model because they are not a for-profit organization. There isn't a monetary return on that investment. So after a while it loses steam and it goes away. The public service model has been a model that has grown and prospered for 60 years.

**So, all of which is to say that you feel pretty confident that the donated model that we've relied on for so long will in fact survive?**

Yeah, I do. I don't know that the inventory that makes up the donated model is going to grow fast enough to accommodate the dramatic increase there has been in organizations that put out public service messages. We're going to have to look at that in years to come. Not-for-profit organizations have become more sophisticated. Everyone has a friend in the agency business. It gets cheaper and cheaper to put together radio spots, television spots, print campaigns with all the new technologies that are available in production. So there is a tremendous amount of volume out there that is all competing for this donated media inventory. I think the donated media as a model will survive. I don't know that it's going to be enough to make everyone happy.

**What are your feelings about the amount of time that broadcasters are donating today?**

I think there is an awful lot of rhetoric out there, "broadcasters should do more, should do more, should do more." I think we have to balance that with the fact that they recognize they have obligations to their communities, but they are also organizations that are in a very competitive environment, and they're businesses. Our government decided to deregulate broadcasting because it recognized that [broadcasters] don't own the viewer anymore. There are too many alternative choices between cable and satellite and soon to be streaming media on the Internet, and all the other distractions. These guys have a business to run. And I think if we don't recognize that we'll be making a big mistake. We should be just as interested in their viability as a successful communications outlet. Because if their business model fails and they go away, who will run our spots?

**What are your feelings about the current regulatory scheme?**

The regulation train left the station 15 years ago, and it's not coming back. I think it's naive of our industry to think that we can make big daddy government make these communications outlets do things for us that they don't want to do. That's not the way we're going to compete in this marketplace.

**In your opinion, what will be the impact of the mergers, like AOL Time Warner and others, on public service advertising?**

I think that one of the things you are going to start to see – because these are public companies and they are always looking for efficiencies – is more centralized decision-making. I'm not saying that that kind of consolidation is going to diminish the opportunity, but I think it changes the way we have to approach the marketplace – you know, be smart about making sure that we are getting in to see the right people, because I think that the decision-making is going to get concentrated in fewer and fewer hands.

It's a folly to think that there is anything that is going to happen that will turn the clock back. We just need to understand that we are going to have to figure out how to compete for attention in this new marketplace. Just as paid advertisers have to compete. They are wrestling with the same things we are. We have a tendency to think that just because they have budgets it must be easy for them. It's really tough to decide how you are going to spend your media dollars to get the biggest share of the audience that you are trying to target. And we don't have budgets, so it's that much tougher for us. But I guess my point is, the universe is not going to change to suit us; we're going to have to figure out how to do business in the new media marketplace.

**So, along those lines, what advice would you give advocates and others who want to create public service campaigns in the future?**

If I could them give any advice, it would be, number one: do what you're doing very, very well. Execute your messages and your creative and make sure you have the highest quality that you can possibly deliver when it comes to the PSA model itself because that will help you compete. Number two, it's tough work, but just basically get out there and get in front of as many media gatekeepers as you possibly can.

**So, finally, if you could look into the future, what do you think the world of PSAs will look like?**

I think it'll look very much like it does today, except it will also be part of the landscape of all the new media out there. I think our messages will find their way to the consumers the same way they have for almost 60 years as we've watched all these new technologies birth all these new media opportunities.