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

# Report of Inspection

## Voice of America's Persian News Network

Report Number ISP-IB-09-27, March 2009

### ~~IMPORTANT NOTICE~~

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## PURPOSE, SCOPE AND METHODOLOGY OF THE INSPECTION

This inspection was conducted in accordance with the Quality Standards for Inspections, as issued by the President's Council on Integrity and Efficiency, and the Inspector's Handbook, as issued by the Office of Inspector General for the U.S. Department of State (Department) and the Broadcasting Board of Governors (BBG).

### PURPOSE

The Office of Inspections provides the Secretary of State, the Chairman of the BBG, and Congress with systematic and independent evaluations of the operations of the Department and the BBG. Inspections cover three broad areas, consistent with Section 209 of the Foreign Service Act of 1980:

- **Policy Implementation:** whether policy goals and objectives are being effectively achieved; whether U.S. interests are being accurately and effectively represented; and whether all elements of an office or mission are being adequately coordinated.
- **Resource Management:** whether resources are being used and managed with maximum efficiency, effectiveness, and economy and whether financial transactions and accounts are properly conducted, maintained, and reported.
- **Management Controls:** whether the administration of activities and operations meets the requirements of applicable laws and regulations; whether internal management controls have been instituted to ensure quality of performance and reduce the likelihood of mismanagement; whether instances of fraud, waste, or abuse exist; and whether adequate steps for detection, correction, and prevention have been taken.

### METHODOLOGY

In conducting this inspection, the inspectors: reviewed pertinent records; as appropriate, circulated, reviewed, and compiled the results of survey instruments; conducted on-site interviews; and reviewed the substance of the report and its findings and recommendations with offices, individuals, organizations, and activities affected by this review.



**United States Department of State  
and the Broadcasting Board of Governors**

*Office of Inspector General*

PREFACE

This report was prepared by the Office of Inspector General (OIG) pursuant to the Inspector General Act of 1978, as amended, and Section 209 of the Foreign Service Act of 1980, as amended. It is one of a series of audit, inspection, investigative, and special reports prepared by OIG periodically as part of its responsibility to promote effective management, accountability and positive change in the Department of State and the Broadcasting Board of Governors.

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

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

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

A handwritten signature in black ink, appearing to read "H. W. Geisel".

Harold W. Geisel  
Acting Inspector General

# TABLE OF CONTENTS

KEY JUDGMENTS .....	1
CONTEXT .....	3
EXECUTIVE DIRECTION .....	5
POLICY AND PROGRAM IMPLEMENTATION.....	9
Strategic Planning and Budget Integration.....	9
PNN Programming .....	10
Following the VOA Charter .....	17
AUDIENCE RESEARCH.....	21
RESOURCE MANAGEMENT.....	25
Administrative Support .....	26
VOA's New York News Bureau .....	28
MANAGEMENT CONTROLS .....	29
Human Resources Management.....	29
Personal Property Management .....	36
Financial Management and Procurement.....	37
LIST OF RECOMMENDATIONS .....	39
INFORMAL RECOMMENDATIONS .....	41
PERSIAN NEWS NETWORK PRINCIPAL OFFICIALS .....	45
ABBREVIATIONS .....	47
Appendix A: Voice of America Charter .....	49
Appendix B: PNN Organization Chart.....	51
Appendix C: Persian News Network Funding.....	53

## KEY JUDGMENTS

- Persian News Network (PNN) is performing a vital function. It is the only platform from which the U.S. Government can reach an Iranian audience with unbiased news and information about U.S. foreign policy and American life. The broadcasting mission of Radio Free Europe/Radio Liberty's Radio Farda is to provide information on news and events within Iran.
- Voice of America (VOA) successfully built PNN (formerly Persian Service) into its first full-fledged network in an extraordinarily short period of time. Given the U.S. strategic interest in communicating with Iranians, PNN represents a major achievement in setting up a network that reaches approximately 29 percent of Iranians in Iran.
- Rapid growth brought a number of problems along with it, including questions of program mix and quality and a lingering atmosphere of discontent among employees. Ameliorating them will be a necessary step in the consolidation of VOA's gains in an important broadcasting arena.
- The increasing importance of the Internet in Iranian society provides VOA with a platform that has the potential to dramatically increase its audience. A strategic plan to exploit that potential, in a manner that complements Radio Farda's Internet efforts, is essential as PNN moves forward.
- The explosive growth of PNN television has come, in part, at the expense of radio. VOA radio broadcasts to Iran may have reached a point of marginal return on investment given the round-the-clock broadcasts of Radio Farda, the likelihood of PNN increasing its focus on the Internet as a platform to connect with audiences inside Iran, and overall resource restraints. Continuation of PNN radio is an appropriate issue for the BBG language service review process.

- There is widespread perception among employees that PNN hiring practices and other personnel actions have not been transparent and may have favored certain groups.

The inspection took place in Washington, DC, between October 3 and December 17, 2008, and in New York City on November 14, 2008, at Voice of America's new bureau. Ambassador John Monjo (Senior Advisor/Consultant), Martha Goode (supervisory senior inspector), Anne Carson, Mark Jacobs, and Kristene McMinn conducted the inspection.

## CONTEXT

PNN serves a vital role in achieving American foreign policy objectives in the Islamic Republic of Iran. The U.S. relationship with Iran receives sustained high-level attention within the U.S. government and in the larger foreign policy community. However, the United States has not had an embassy in Iran in over 35 years, longer than most Iranians have been alive (half of all Iranians are under 30 years old). In Iran, VOA is the official face of America. There are no other available options for presenting the American point of view inside Iran. Iran's location in the Middle East, next to Iraq, makes it a critical area in the quest for international stability. Confronting Iran's determination to establish a program of nuclear energy with possible implications for nuclear weapons requires all the tools and diplomatic skills that the United States has at its disposal. James K. Glassman, former Under Secretary of State for Public Diplomacy and Public Affairs, said that key U.S. foreign policy goals are "to diminish the threat to Americans and the rest of the world posed by violent extremism and weapons of mass destruction and to help people around the world achieve freedom."<sup>1</sup>

The BBG mission statement is "to promote and sustain freedom and democracy by broadcasting accurate and objective news and information about the United States and the world to audiences overseas."<sup>2</sup> To fulfill its mandate under the VOA charter, PNN aims to be "a consistently reliable and authoritative source of news."<sup>3</sup> (See Appendix A). PNN strives to present unbiased news as well as objective information about U.S. society and policy.

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<sup>1</sup>"The New Age of Public Diplomacy," speech delivered at Chatham House, London, on September 11, 2008.

<sup>2</sup>BBG's Mission Statement, Performance and Accountability Report for FY 2007, p. 4.

<sup>3</sup>U.S. Information and Educational Exchange Act of 1948, Title V, § 503, Pub. L. No. 80-402, 62 Stat. 6, as amended (codified at 22 U.S.C. § 1463).

VOA's radio broadcasts to Iran began in the early 1940s and existed with intermittent breaks up to the present.<sup>4</sup> VOA's service was originally called Farsi Service, based on the language used. In July 2007, VOA's Persian Service was officially named PNN, reflecting its mission scope<sup>5</sup> BBG has declared PNN to be one of its top priorities. Congress has strongly supported it with supplemental funding, considering PNN vital in combating radical extremism by providing unbiased news about the world and America to Iranians.

The new network—the first of its kind at VOA—broadcasts 24 hours a day, including 6 hours of original programming and 1 hour of acquired programming (from the History Channel) that are repeated throughout the day, to Persian speakers throughout Iran.<sup>6</sup> PNN reaches millions of people weekly with Persian-language programs on television, radio, and the Internet. It has the largest combined radio and television audience of all international broadcasters to Iran. Its radio programs include five hours a day on shortwave and the Internet. One hour consists of original material and the other four are simulcast transmissions of television material. Some audience research indicates that one in four adult Iranians either listens to or watches a VOA program at least once a week. Accurate data regarding Iranians' viewing habits is hard to come by, given the challenges of conducting audience surveys in a repressive political environment.

At the time of this inspection, PNN had 83 full-time employees (FTEs), of the 92 full-time employee slots available. It also had 122 purchase order vendors (POVs) and two contractors using other referral agencies. There were also 15 correspondents and eight cameramen around the world. PNN costs in FY 2008 for salaries and operating expenses totaled \$16,299,469.

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<sup>4</sup>VOA broadcast programs to Iran in Persian from 1941-1945, 1949-1960, 1964-1966, and 1979 to the present.

<sup>5</sup>The name of the language service had already changed from the Farsi Service to the Persian Service in 2001. BBG management explained that Farsi is an Iranian word and Persian is the English equivalent. Other international broadcasters use the word Persian.

<sup>6</sup>As set forth in the BBG FY 2009 budget proposal, BBG plans to reach the approximately 16 million ethnic Azeris living in Iran with a one-hour RFE/RL radio program, with companion multimedia, online, and mobile programming, at a cost of over \$1 million.



## EXECUTIVE DIRECTION

Beginning in 2007, an experienced VOA manager with knowledge of the Persian language was appointed as director of PNN and oversaw the rapid growth of the Farsi service into VOA's first full-fledged network. It went from about 30 staff members in 2007 to 83 FTEs plus over 120 contractors. Under this director, PNN grew from an hour of television broadcasts to 6 hours of daily original programming, along with an hour of acquired material that requires translation. Those 7 hours are repeated to make up 24 hours a day, 7 days a week. In 2008, shortly before the inspection began, a new acting director of PNN was appointed.

The acting director reports to senior VOA management including the associate director for Language Programming, the executive editor, and the Director of VOA. Inside PNN, the acting director supervises the work of all FTEs and contractors and oversees the production of material for television, radio, and Internet.

At the management level, below the acting director are an executive editor, a senior executive producer, an operations manager, and an executive officer. (See Appendix B, Organization Chart provided by PNN). The chart may not reflect the actual management relationships.) At the production level, individual television shows are the responsibility of an executive producer, working with a managing editor. At present none of the executive producers speaks Persian, while all of the managing editors do. In part because of the language issue, managing editors report not to the executive producer of their show but to a Persian-speaking senior executive editor.

This arrangement is the source of confusion and sometimes of conflict. Lacking the language of the programs they oversee, as well as a background in Iranian affairs, executive producers must rely on their managing editor to approve the shows' content and resolve differences of opinion among staff. When controversial or problematic issues arise, the executive producers are perceived to lack a full understanding of the issue. Staff members frequently express the view that executive producers make their decisions based on their personal relationships with Persian-speaking staff rather than on the merits of the case at hand.

PNN's extraordinary and unusually rapid growth represented a huge challenge to management. The FTE staff was greatly increased, and a large number of POVs were also brought on board; at present, there are more POVs working in PNN than FTEs. While VOA is to be commended for successfully meeting the expansion challenge, the scale and rapidity of growth have been accompanied by a number of problems inside PNN.

The main problem that PNN faces is its atmosphere of discontent. The OIG inspection team heard about perceptions of unfairness, charges of political bias, the operation of cliques, and the hiring and rewarding of unqualified people. Some more experienced staff members associated with the service's declining radio operations are critical of newer staff members hired for the expanding television programming. The issue of Persian-language competency is also a point of contention, as well as the issue of cultural norms and expectations. Some Persian-speaking and Iranian-born employees find American management insensitive to Iranian ways; conversely, some American managers believe that Iranian and Iranian-American employees have not adapted to the expectations and atmosphere of an American workplace. VOA management is aware of these challenges. It told the OIG team that it does not consider such issues uncommon for a broadcasting organization with a mixture of backgrounds and viewpoints, and is taking steps to address the condition.

While everyone involved with the operation is cognizant of the importance of VOA broadcasting to Iran, some of those who work in PNN appear to lack a clear understanding of the mission of PNN and the centrality of the VOA charter to their work, underscoring the need for additional training.

The acting director has been at PNN a short period of time but already has instituted some changes that have been received positively by PNN staff. The acting director has held one-on-one meetings with a large number of PNN staff; increased the number of meetings and sought to resolve conflicts by sitting down with the parties involved; and focused on program content, reiterating the centrality of the VOA charter and the message that the only "ism" permissible at VOA is journalism. A majority of staff indicated their approval of these changes, although most expressed the view that much more needs to be done to make PNN an efficient and harmonious broadcast operation.

As promising as these changes are, VOA needs to consolidate the gains made by PNN; improving internal communication will be central to this effort. This includes holding regular and more frequent meetings, including town hall meetings, among PNN staff at all levels, to ensure that everyone understands his or her job responsibilities; the goals and objectives of the program; what other program staff are working on; and the role of the VOA charter and mission in the context of PNN. Man-

agement may also explore other means and mechanisms for strengthening internal communication to dispel the negative perceptions and misinformation under which many staffers labor. Management transparency will help to address rumor or suspicion at different levels of the network.

While those who work in PNN tend to generally appreciate the importance of their work, they are not always clear about the mission, PNN goals and objectives, or of the specific program in which they are engaged. VOA's production of a statement of purpose connecting the VOA charter with goals and objectives for each of the network's programs would enhance the staff's understanding of their responsibilities by putting it in a broader context.

VOA's clarification of the lines of decisionmaking authority for individual programs may help to resolve misunderstandings about roles and responsibilities that exist in PNN. This will require some reflection on the importance of Persian language ability among managers. VOA having managing editors report to a senior executive editor who does not have line responsibility for individual programs may be a tactical solution that calls for some strategic rethinking. In addition, the roles and responsibilities for like functions of program anchors appear to vary by program. VOA's standardization of expectations and responsibilities would likely improve both performance and the overall atmosphere.

**Recommendation 1:** Voice of America should develop and articulate a statement of Persian News Network program goals and objectives consistent with Voice of America's mission and ensure that it is disseminated and understood. (Action: VOA)

**Recommendation 2:** Voice of America should, as appropriate, revise the Persian News Network's organizational structure to clarify the lines of responsibility and authority. (Action: VOA)

**Recommendation 3:** Voice of America should develop and implement an internal communication plan for the Persian News Network to increase the interaction between its elements, both horizontally and vertically, and to share important information with the staff. (Action: VOA)



## POLICY AND PROGRAM IMPLEMENTATION

### STRATEGIC PLANNING AND BUDGET INTEGRATION

Officials in BBG's strategic planning area told the OIG team that PNN management has been an active participant in performance planning. Its annual performance plan meshes with BBG's strategic plan, on which budget decisions are based. BBG's mission, as stated in its 2008-2013 strategic plan, is

to promote freedom and democracy and to enhance understanding through multimedia communication of accurate, objective, and balanced news, information, and other programming about America and the world to audiences overseas.<sup>7</sup>

Implementation strategies from BBG's 2008-2013 strategic plan that are relevant to PNN include:

- enhancing program delivery across all relevant platforms
- building on the BBG reach and impact within the Muslim world
- helping audiences in authoritarian countries understand the principles and practices of democratic, free, and just societies
- employing modern communication techniques and technologies
- facilitating citizen discourse; and broadening cooperation within U.S. public diplomacy

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<sup>7</sup>By comparison, the Department FY 2007-2012 strategic plan, Near East region, Iran, is: "The single largest long-term threat to regional stability and peace is Iran...In the years ahead, we anticipate increased needs for broadcasting, cultural and educational exchanges, and democracy programming in Iran."

BBG and PNN are also in accord with the FY 2002 President's Management Agenda, part five, entitled "Budget and Performance Integration."<sup>8</sup> The purpose of the agenda is to formally integrate performance with budget decisions. By participating in BBG's cycle of annual performance plans and language service reviews, PNN adjusts its programs to become more effective, based on International Broadcasting Bureau (IBB) recommendations and formal and anecdotal audience research. For example, in the September 16, 2008 follow-up to an annual review, VOA's Office of the Associate Director for Programs said that it was in the process of meeting with PNN regularly to discuss conforming to the VOA charter.

Specifically, at the working level, the OIG team was told that PNN had been very active in creating its plan. A group had worked closely with the BBG to link the PNN plan with BBG's strategic plan. PNN's planning group came up with the areas that were most important to address: training, management, maintaining credibility, and focusing on BBG's strategic plan.

The plan template includes a section that elicits information for the 1997 Government Performance and Results Act requirements. The plan has to include what resources PNN is working with from BBG's budget. There should be no unrealistic requests. Also, PNN's plan must mention any enhancements that PNN gets. PNN has to show that it has been accountable for that money and is using it appropriately. There is also a section where PNN can discuss the challenges it faces in the future, regardless of funding. It can describe envisioned strategies not necessarily tied to resources.

## PNN PROGRAMMING

PNN uses television, radio, and the Internet to get its programming to its audience in Iran. There are 7 hours of television programming a day, with 6 hours of original programming and 1 hour of acquired programming. These 7 hours are repeated throughout the day for a total of 24 hours. There are 5 hours a day of radio (1 hour original radio only and 4 hours of radio or television simulcasts on short-wave and the Internet). There is an initiative to increase the use of the Internet and to use it as an important part of a connective mix with television and radio.

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<sup>8</sup>OIG reviewed this issue BBG-wide in 2004: OIG Report No. IBO-A-05-01, *Review of the Broadcasting Board of Governors' Progress in Linking Its Budget Process and Strategic Planning* (December 2004).

In general, the process for getting a television show on the air each day matches that of commercial television. Ideas are proposed by PNN writers and producers. They are discussed at early morning editorial meetings. A representative from VOA's Central News discusses the hot topics of the day. Managing editors review whether these topics would be of interest to Iranian audiences. They are put together through the work of executive producers, managing editors, anchors, writers, translators, and technical production crews. Each producer is required to prepare a report after each program.

## Current Television Programming

After an extensive personnel expansion in 2007, PNN now has the following programs, with hours representing the summer and fall schedule:

- *Today in Washington* (9:30 a.m. Eastern Standard Time (ET)/6 p.m. in Iran) — a brief overview of the top news headlines, a quick look at major news events taking place in Washington and around the world, and a preview of what's coming up on other PNN shows.
- *History Channel* (9:45 a.m. ET/6:15 p.m. in Iran) — cultural programming from the A&E Television Network featuring documentaries highlighting events, individuals, and inventions that have historically shaped the cultural fabric and political landscape of the United States.
- *Newsbrief* (10:30 a.m. ET/7 p.m. in Iran) – 10 minutes of the top stories making headlines around the world.
- *Today's Woman* (10:40 a.m. ET/7:10 p.m. in Iran) — a contemporary news program with a pool of regular participants who discuss and debate issues impacting women around the globe.
- *News & Views* (11:30 a.m. ET/8 p.m. in Iran) — PNN's flagship program expanded to 2 hours in July 2007. This 2-hour program features live news coverage of the latest headlines from Washington, Iran, and across the globe. The expanded News and Views includes daily live reports from the Department and Capitol Hill.
- *Roundtable with You* (1:30 p.m. ET/10 p.m. in Iran) — PNN's longest running program is a talk show with the entire hour devoted to popular guests discussing current events, politics, pop culture, and global health. Includes viewer participation via phone calls and e-mails.

- *Late Edition* (2:30 p.m. ET/11 p.m. in Iran) —Begins with a closer look at the day's top story. Targeted to a younger demographic, the program also features segments regarding Iran's student movement, health, technology, sports, entertainment, and culture.
- *NewsTalk* (3:30 p.m./12 a.m. in Iran) — PNN's original programming block concludes with this news discussion program featuring a regular panel of experts who examine and dissect the day's headlines.

## Optimum Hours and Staffing

BBG and VOA management as well as most of the PNN staff, with whom the OIG team talked, point to the increase from 1 to 6 hours of original programming a day as a great accomplishment. However, they question whether PNN resources are sufficient to support 6 hours of quality original programming a day.

VOA management told the OIG team that there is no industry standard for the number of workers needed to put on a show. Nevertheless, the OIG team heard from many people on the subject. Some executive producers felt that they did not have enough people. One producer said that there were never enough people. Another said that the small number of people she had for her show did not seem fair compared with the number that others had. Many FTEs and contractors commented on their own situation. Two young contractors felt that their shows would do better with just a third of the existing staffing if the management were good. An experienced producer commented that the young contractors were probably not realistic. Others said that there were people in their group who were idle and not being utilized.

Another thing for PNN to consider at this point is whether there are too many or too few program hours, or whether existing staff can improve the quality of the programming offered within the current broadcast schedule. The majority of those who commented on this question, managers and workers, felt that PNN would not suffer if its hours were reduced and attention were focused on quality rather than quantity. IBB's April 2008 performance review of PNN suggested that PNN consider cutting down the number of shows. As a VOA official said, now is the time for PNN to take a step back and assess whether the staffing is sufficient to improve the quality of its programming. PNN's credibility is vital to its success and to U.S. foreign policy, and quality affects credibility. (The issue of quality will also be discussed in the section on the VOA charter and transparency.)



**Recommendation 4:** Voice of America should review its programming, including the number of hours, and determine if changes should be made in order to increase quality. (Action: VOA)

**Recommendation 5:** Voice of America should conduct an assessment of the number of workers needed for each of its television programs and allocate its human resources accordingly. (Action: VOA)

## PNN on the Internet

PNN's Performance Plan for the years 2009-2011 articulates ambitious yet sensible goals to increase the network's presence and reach on the Internet. These include expanding and reformatting the Web site with additional multimedia and interactive features. Among proposed additions are a video of the day, slideshows, a guest-of-the-week online chat, and an American Life page. In 2006, when VOA received enhancement funds for PNN, management set a goal of establishing a more frequently updated Web presence by 2008.

To date, some progress has been made, and there is general agreement in PNN that their Web presence will play an increasingly important role in the media mix in the coming years. They also agree that they have not yet exploited its full potential. Getting to that point will require a detailed plan of action with realistic targets and timelines, along with an assessment of staffing needs. Joining the Web site with the English-language news desk now under consideration is an idea that merits exploration. To draw readers to the Web site and keep them coming back, PNN will need to update the content frequently and regularly. For that reason, real-time access to fresh material is a necessity for the Web staff. Translating and providing such material to all elements of PNN will be the goal of the news desk.

Moving forward with the Web site calls for an assessment of Iranian habits and patterns of Internet usage, to the extent that accurate data can be obtained. Some research suggests that, while Internet use continues to rise, cost remains a limiting factor. The repressive political environment may also figure in as a limiting factor. At the same time, VOA's target audience in Iran — the high percentage of the population's young people — is most likely to use and be comfortable with the Internet and technology.

Despite potential constraints on access and availability among Iranians, PNN management clearly sees that creative, interactive growth of their Web site presence is a vital part of the overall strategy to communicate with Iranian audiences. It also understands that BBG's strategic plan for reaching Iranian audiences includes the complementary coverage provided by Radio Farda and PNN Web sites.

**Recommendation 6:** Voice of America should continue to develop and implement a plan to build the Persian News Network's Web presence into an interactive 24/7 operation, with timelines and measurable milestones. This Web presence should complement Radio Farda's Web efforts. (Action: VOA)

## PNN Radio

VOA's radio broadcasts to Iran began in the early 1940s and have existed with intermittent breaks up the present. It was originally called the Farsi Service. In July 2007, the name was changed to the Persian News Network.

At present, PNN produces one hour of original radio programming, which is broadcast during the Tehran breakfast hour. In addition, 4 hours of PNN television are simulcast on radio. Political constraints prevent the use of affiliate stations inside Iran. Shortwave, cross-border medium wave, and the Internet are the only feasible means of radio transmission. Currently all VOA radio broadcasting to Iran is done by shortwave.

In 2002, VOA joined with Radio Free Europe/Radio Free Liberty (RFE/RL) to begin broadcasting Radio Farda to Iran. In July 2008, Radio Farda moved to RFE/RL exclusively. Radio Farda broadcasts 24 hours a day to Iran from AM, shortwave, and digital audio satellite, as well as by Internet. The station offers news, information, public affairs, and entertainment targeting Iran's population of young people. It functions as a surrogate but also includes information and interviews that are not connected to Iran.

During the same period that saw the rise of Radio Farda, PNN television experienced significant growth. That process drew resources, personnel, and attention away from radio programming. Staff numbers dwindled as personnel were assigned to television programs, and morale among those who remain is conspicuously low. VOA management said that this contributed significantly to the discontent between this group and the new television staff.

Inside VOA, no consensus appears to exist on the importance or effectiveness of PNN radio. Some evidence suggests that perhaps 2 percent of the population listens to PNN radio, and anecdotes from travelers to Iran sometimes refer to avid listeners of the short-wave broadcasts. However, that same anecdotal evidence suggests that shortwave listeners are people over 70 years of age. PNN's target demographic group is Iran's burgeoning population of young people. Inside VOA and PNN, strong feelings both for and against radio were voiced, yet virtually all agree that it is presently a pale shadow of its former self.

In the context of a dramatically changed media environment, VOA does not appear to have clearly delineated a mission for Persian-language radio as part of PNN, or to have engaged in strategic rethinking regarding its role. BBG conducts an annual language service review to set operating priorities for the following year such as the use of radio to achieve its goals.

**Recommendation 7:** The Broadcasting Board of Governors should, in coordination with Voice of America, in the context of its annual language service review process, determine whether Voice of America radio broadcasting in Persian should be discontinued or reinvigorated. If it is to be reinvigorated, it should be given a clear mission as an integral part of the Persian News Network, along with a clear estimate of resources to accomplish this mission. (Action: BBG, in coordination with VOA)

## News Desk

PNN's FY 2009-2011 Annual Performance Plan establishes a 2009 target for creating a Persian-language news desk, a goal that is not just laudable but essential. Having a central point for producing translations of news articles into the Persian language will substantially improve efficiency at the network and produce other benefits at the same time. It represents an important next step in consolidating the gains made by VOA in launching its first full-fledged network.

At present, a good deal of duplicative translation work is being done by staff members working on the same issue or subject matter for different programs or in different media (television, radio, and the Internet). People inside and outside of PNN commented on the repetition in programming, particularly since its broadcast hours had increased. While some of this duplication is the result of imperfect communication within PNN, in the absence of a central source and repository of timely content in Persian, it is likely to continue.

In addition to streamlining the translation effort, the news desk will have the spin-off benefit of standardizing the Persian language employed by PNN. This has been a frequent point of contention among staff who disagree on questions of grammar, usage, diction, and tone. A Persian style manual was discussed at one point, but it has not yet materialized in final form. The OIG team made an informal recommendation on this matter.

As envisioned, the news desk will focus on translation of hard news. Given the varied content of PNN programs, there will continue to be a need for translated material on “softer” subjects such as culture and American life. Nevertheless, the majority of stories needed for PNN programs can and should emanate from a central news desk.

Parallel to the news desk initiative is PNN’s push to expand its presence on the Internet. This goal is described at length in the performance plan. Frequent updating of content is vital to luring readers to a Web site and retaining their allegiance. Some at PNN envision making their Web site the portal of choice for Persian speakers to come to every day for news and information. Given that goal, and the changing nature of content, linking the Web site and the news desk operations makes sense. Making regularly updated translations from the news desk available, via a shared drive or an Intranet site, to all PNN elements will help the Web site staff reach their goal.

At present, an employee has been assigned responsibility for overseeing the news desk project, and qualified persons on staff have been identified as potential full-time translators. To date, however, the news desk does not exist. Creating the desk and managing the transition to its full implementation is admittedly a daunting task. Summarily moving qualified people, who are among PNN’s most talented translators, to the news desk would cripple the shows that they currently work on, by leaving them without the staff that produce their broadcast material. Nevertheless, given the longer-term importance of the initiative, a thoughtful plan for making that transition is imperative.

**Recommendation 8:** Voice of America should develop a plan to create and implement a Persian-language news desk, including a timetable, measurable milestones, and staffing implications. (Action: VOA)

**Recommendation 9:** Voice of America should integrate its Persian-language news desk with its Internet operation, making regularly updated translations of news stories available to the Web site staff on a shared drive or an Intranet site. (Action: VOA)

## FOLLOWING THE VOA CHARTER

There is great interest in VOA's Persian Language Service in the foreign policy community, which accentuates the need for open and transparent operations. This is especially true because PNN's programming is in Persian. VOA is to be commended for its initiative in producing "PNN Insights," a periodic publication in English summarizing PNN's activities and setting forth a synopsis of its broadcasts. In addition, translations of randomly selected shows are publicly available on the Internet.<sup>9</sup> This enables BBG and VOA management to monitor PNN broadcasts and to respond to inquiries about PNN coverage.

**Best Practice:** PNN Insider Enhances Communications and Transparency

**Issue:** Voice of America's Persian News Network employs more than 200 people in one capacity or another. It was hard for the workers to keep up with the main television programming created by their colleagues. In addition, because the programs are in the Persian language, non-Persian speakers did not know what was happening on PNN. There was no way to inform interested parties in BBG, Congress, the Department, and other agencies of PNN's main stories. Finally, PNN had no efficient database that could serve as a quick, historical reminder of PNN's coverage on a weekly basis.

**Response:** About a year and a half ago, PNN began an internal weekly newsletter called PNN Insider about major PNN programs. It was initially begun to serve as a historical reference and was distributed at first in hardcopy. As PNN increased its television hours in the last 2 years, it went to an electronic format and distribution. Every PNN program has a designated representative who sends weekly highlights to the Insider editor. The newsletter is e-mailed to all PNN employees. It is also sent to various people in Congress, the BBG, and the Department and to others who request it.

**Result:** PNN employees now find it easier to keep up with PNN's output. Non-Persian speakers have a chance to read summaries of major coverage in English. The summaries provide transparency into PNN's work. Now, says a PNN manager, answers to queries can be found "at the drop of a hat."

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<sup>9</sup> <http://www.bbg.gov/pressroom/perisiantranslations.cfm>. (last accessed March 10, 2009).

According to the VOA charter, “VOA will serve as a consistently reliable and authoritative source of news. VOA news will be accurate, objective and comprehensive.”<sup>10</sup>

VOA’s journalistic code sets the standard:

VOA airs all relevant facts and opinions on important news events and issues. VOA corrects errors or omissions in its own broadcasts at the earliest opportunity.

VOA is alert to, and rejects, efforts by special interest groups, foreign or domestic, to use its broadcasts as a platform for their own views. This applies to all programs and program segments, including opinion or press roundups, programs discussing letters, listener comments, or call-in shows. In the case of call-ins, views of a single party must be challenged by the interviewer if alternative opinions are unrepresented.

When inspecting the BBG and its entities, OIG inspectors must “respect the journalistic integrity of all the broadcasters...and may not evaluate the philosophical or political perspectives reflected in the content of broadcasts.”<sup>11</sup> The OIG team did not evaluate philosophical or political perspectives. It did, however, hear unsolicited questions about PNN’s quality from the majority of people with whom it spoke.

InterMedia survey interviews and other anecdotal information confirm that Iranians enthusiastically welcome information provided on VOA. The OIG team heard that ordinary members of the public throughout the Middle East recognize PNN broadcasters, greet them fondly, and praise their work.

As recounted elsewhere in this report, PNN expanded rapidly to 6 hours of original daily programming. It engaged people with varying levels of skills and experience and did not always establish clear lines of authority among them. Under these circumstances, maintaining quality presents a challenge.

Several people told the OIG team that PNN television broadcasts do not now face substantial competition, but the British Broadcasting Corporation (BBC) has plans to begin Persian-language television broadcasts in the near future. Iranians will then have a choice. Many PNN workers said that BBC programming would highlight any VOA quality shortcomings. Some feared that without PNN’s vigilance, Iranian viewers would abandon VOA and turn to BBC.

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<sup>10</sup>22 U.S.C. § 6202(c)(1).

<sup>11</sup>22 U.S.C. § 6203(a)(3)(B).

## Technical Quality

PNN has a large staff, many of whom have had distinguished careers in an impressive range of endeavors, but comparatively few have technical training in television production. PNN workers have indicated the need for improvement in lighting, sound, and camera work to create a more professional product; many said that they are learning on the job. In addition to a need for technical training, the OIG team learned that certain lines of authority were not clearly delineated. Some PNN workers were concerned that Persian-speaking managing editors did not have the clear authority to issue directions to staff, while executive producers who possessed the authority did not speak Persian and were therefore limited in their ability to communicate effectively with staff. The senior executive editor speaks Persian and is responsible for all language-related issues, but he is stretched thin. The OIG team's recommendation in the Executive Direction section about clarifying the duties and authorities of PNN management is meant to address this problem. A recommendation about technical training appears in the Human Resources section of this report.

Producers file a report after each program, but some workers felt the need for more feedback on their technical contributions and a more robust daily assessment. IBB's Office of Performance Review does this annually with detailed recommendations. However, more immediate, if not daily, feedback and assessment is valuable for continuous improvement. This is being covered to a certain extent by some contractors and producers with long experience in television production. The OIG team, made an informal recommendation in this area.

## Journalism Standards

People inside and outside the U.S. Government raised concerns about bias, but an analysis of that issue is beyond the scope of the OIG inspection. The OIG team's discussion of this area is based on information provided to it by interviewees and does not in any respect represent OIG's judgment on PNN content. For example, some PNN FTEs and contractors told the OIG team that, in their view, some of PNN's television news coverage could use more balance and objectivity. One respected academic, himself an opponent of the current regime in Iran, feared that PNN was losing its hard-won credibility. Three U.S. Government officials, who otherwise praised PNN and its valuable contribution, echoed these concerns. InterMedia interview survey data quote several Iranian participants who expressed concerns about objectivity and balance after watching selected PNN broadcasts.



Many staff members told the OIG team that the quality of the Persian language used is important to preserve balance and accuracy. However, they disagree on what constitutes the ideal quality. Points of view may depend on how long a Persian speaker has been away from Iran or how formally a person was educated in the Persian language. The Persian speakers who work for PNN include a relatively senior contingent who came out of Iran about the time of the revolution, a younger group who have left Iran in recent years for a variety of reasons, and Iranian-Americans brought up in Persian-speaking households. The executive producers do not speak Persian but the senior executive editor and managing editors are Persian speakers. The division director relies on the Persian speakers. There are many well-qualified translators who work from English to Persian, but the OIG team heard of one incident when PNN took immediate action in response to an incorrect translation that was allegedly intentional.

PNN managers address these challenges daily. The OIG team, for example, saw a series of managerial e-mails describing how an anchor should balance the views of guests with appropriate questions and direction of the conversation. PNN has also hired experienced television journalists as contractors to serve as mentors to less experienced staff. IBB's performance review also recommended that VOA management review the requirements of the charter and journalistic code with PNN staff. PNN management said that this is done continually. Also, as mentioned earlier, PNN continues its effort to hire qualified Persian speakers with an understanding of the current Iranian culture. VOA management said that it has often enlisted disinterested Persian-speaking experts to provide advisory assistance.



## AUDIENCE RESEARCH

BBG's strategic plan states that it is a research-driven organization. Audience research is an important part of IBB's annual performance review, which leads to BBG's annual priority-setting exercise, the language service review. As with many BBG language services, it is difficult to collect statistical information about PNN's audience opinion and habits from within a closed regime. Some research conducted by BBG's audience research contractor is mixed on the subject of overall viewership. Its annual surveys indicate a viewership of 25 to 30 percent; yet a survey that focused on President Ahmadinejad's visit to New York City pegged viewership at 17 percent, lower but still significant. To supplement formal audience research, PNN receives information from several sources, both formal and informal, indicating that PNN is part of the lives of a large number of Iranians.

The OIG team informed PNN of various sources within the Department that provide information about Iran and international broadcasting. The team established informal e-mail links between the PNN director and public affairs staff assigned to U.S. Government offices in Dubai to ensure that the PNN director receive effective notification of reports that might be relevant to PNN.

### Radio and Television

Extensive anecdotal evidence from a wide variety of sources confirms that PNN television broadcasts reach a wide audience. Audience interaction on call-in shows and e-mails confirm this. Still another indication of the impact of PNN broadcasts is its mention by other news organizations. For example, on September 13, 2008, the National Review Online blog, *The Corner*, mentioned that the Persian language news organization TABNAK was concerned that deficiencies in Iranian state-run media were driving Iranians towards U.S. international broadcasts. On November 15, 2008, National Public Broadcasting's program, *All Things Considered*, said that calls had poured in to PNN in response to the election of Senator Barack Obama.

InterMedia, a respected public opinion research firm, performs (through sub-contractors) annual telephone survey measuring PNN television and radio audiences. The last survey, conducted in December 2007, reports that 1.3 percent had listened to a VOA radio broadcast in the previous week. However, the survey indicated that

29.5 percent of Iranians had watched a PNN television show in the previous week. As a part of the annual survey, InterMedia also conducts more in-depth research in which two dozen viewers assess and critique PNN television shows.<sup>12</sup> These surveys help senior BBG and VOA management keep abreast of developments concerning PNN and also contribute to the IBB Office of Performance Review's yearly assessment of the work of each VOA language service.

InterMedia conducted a telephone survey of 506 households in four Iranian cities to ascertain whether Iranians turned to U.S. international broadcasters (PNN and Radio Farda) for news on President Ahmadinejad's visit to New York City in October 2007. Survey results indicate that 17 percent of Iranians, including a disproportionately large number of young and educated persons, watched the BBG broadcasting entities' (including Radio Farda's) coverage of the visit. Three-quarters of the 17 percent who watched the BBG programming said that the coverage helped them understand the American reaction to the visit.

InterMedia's research provides miscellaneous interesting facts about television viewership. In November 2006, when PNN had 4 hours of television, its viewership was 20.2 percent. In January 2008, when PNN had 6 hours of original programming and an hour of the History Channel, viewership increased to 29.4 percent. In general, for all television viewers, not just PNN viewers, there are daily trends. Viewership rises sharply from about 20 percent at 6:00 p.m., peaking at 65 percent at about 9:30 p.m. and falling to 30 percent at 11:00 p.m. and to 10 percent at midnight.

At the beginning of this inspection, some managers told the OIG team that VOA and InterMedia conduct telephone surveys from locations outside Iran, rather than doing audience surveys inside Iran, based upon their understanding that the Department took the position that no U.S. firm should conduct any business inside Iran. The OIG team verified that public opinion firms must apply for a license to conduct business in-country from the Department of Treasury Office of Foreign Asset Control. Later, BBG clarified that it already knew about this procedure but had decided at some point not to apply for the Office of Foreign Asset Control license out of fear for the safety of the people on the ground in Iran. After research, officials verified that BBG did not have a current license to conduct in-country surveys

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<sup>12</sup>PNN also broadcasts translated History Channel programs daily, but there is not yet any audience research. Viewership figures for the History Channel programs could give a useful frame of reference for other PNN programs and would also help gauge audience interest in documentaries.

but that a stringer had a license. A BBG official said the decision not to apply for one was based on an incident in 2002 of two Iranian researchers who were thrown in jail when they published a report in Iran showing research results that were favorable to the United States.

Any entity, including government entities, must apply for the license to perform in-country surveys. The Department acknowledged that there was sensitivity involved in granting licenses to BBG for audience research because the research would likely involve asking questions about satellite television dishes, which are illegal in Iran. It would be to BBG's benefit to apply for the Office of Foreign Asset Control license that might prove valuable under the right circumstances. The OIG team made an informal recommendation on this subject.

## Internet

The VOA PNN Web site reported approximately 36 million visits in 2007. Of these visits, 5 million came directly through the VOA servers and 31 million were through proxy servers. However, the Web site traffic has apparently fallen off sharply. In December 2007, there were 6 million proxy server visits. In January 2008, that number fell by half to 3 million. In November 2008, there were only 2 million. It would be helpful to try to determine why this decrease has occurred. A VOA officer suggested that technical reasons might be involved and decreased public interest is also a possibility. One way to collect important user information could come from a customer satisfaction survey on the Web site itself. The OIG team made an informal recommendation on this subject. (See discussion of PNN's Internet in the Program Implementation section of this report.) VOA management told the OIG team that it has noted these figures and is reviewing them and the cause of any decrease.

## Short Messaging Service

InterMedia reported that, as of December 2007, 38 percent of Iranians had used short messaging service (SMS) in the preceding 24 hours. According to the U.S. Government Open Source Center, Iranians have used SMS to create social networks within which they can spread humorous and subversive messages. An Open Source Center analyst told the OIG team that the Iranian Government even uses SMS messages to warn the population of traffic jams. OIG made an informal recommendation about PNN's use of SMS. PNN does not use SMS because it would require an in-country service center to support it.

InterMedia's annual research is an important tool in BBG's strategic plan of being a research-driven organization. However, in the case of a language service that is building itself up rapidly to fulfill an urgent foreign policy need, more timely research would be invaluable for programming decisions. This could perhaps be along the lines of the \$60,000 telephone survey about President Ahmadinejad in New York. VOA management acknowledges the importance of current research but must distribute its research funds over all of its language services.

**Recommendation 10:** The Broadcasting Board of Governors should undertake audience research surveys at least twice a year, funding permitting, to have information on audience preferences upon which to adjust its Persian News Network programming. (Action: BBG)

## RESOURCE MANAGEMENT

In 2008, PNN was allocated about \$8 million for general operating expenses (non-salary) including \$6 million from VOA's domestic operating budget and \$2 million carried over from the FY 2006 Emergency Supplemental. A more detailed breakout of PNN's funding is provided in Appendix C.

### *Persian News Network Expenditures and Staffing FY 2008<sup>13</sup>*

Funding Source	Number of Direct Hires	Salaries	General Operating Expenses	Total Funding
VOA PNN's General Operating Funds	83	\$8,413,549	\$5,789,893	\$14,203,442
FY 2006 Emergency Supplemental			\$2,096,027	\$2,096,027
<b>Total</b>			<b>\$7,885,920</b>	<b>\$16,299,469</b>

As indicated earlier, Persian Service expanded rapidly from FY 2006-2008 primarily after Congress appropriated \$36.1 million to BBG in the Emergency Supplemental Appropriations Act for Defense, the Global War on Terror, and Hurricane Recovery, 2006 for Iran.<sup>14</sup> The BBG allotted the \$36.1 million for purposes shown below:

#### Broadcasting Capital Improvements to<sup>15</sup>:

- build two television studios in Washington DC, and upgrade existing television studios and control rooms for PNN use in Washington DC, New York, Los Angeles, and London \$13,826,000

- purchase a transmitter for Radio Farda \$12,000,000

#### International Broadcasting Operations

- ramp up staffing, contractors, equipment, and licenses within PNN \$ 7,624,000

- enhance Radio Farda programming \$ 2,650,000

**Total** **\$36,100,000**

<sup>13</sup>FY 2008 Actual expenditures provided by the CFO's office.

<sup>14</sup>Pub. L. No. 109-234, 120 Stat. 418.

<sup>15</sup>Funds for these projects were allotted to IBB-Engineering. The OIG team did not review those projects during the PNN inspection.

PNN was allotted about \$7.6 million of the FY 2006 funds to ramp up staffing, equipment and contractors, though PNN did work with IBB-Engineering and VOA Broadcast Operations to ensure the studios and supporting operations were adequate.

The vast majority of funding allotted to PNN (including both regular and emergency supplemental funding) is spent on POVs and on the expenses of remote reporting (remotes) for the different programs. At the end of FY 2008, PNN had \$146,000 remaining from the FY 2006 emergency supplemental primarily because PNN cancelled its plans (and reserved budget) to open a satellite bureau in the Middle East. PNN had to scrutinize expenditures in FY 2009 given the limited amount of funding it was allotted during this continuing resolution. The current PNN acting director cancelled a project he did not think was cost effective, and PNN has cut back on its use of remotes that are costly. The OIG team left an informal recommendation that PNN also look to reduce its overtime expenditures, which averaged \$1,815 per person for FY 2008.

## ADMINISTRATIVE SUPPORT

The majority of PNN's administrative support (entering and tracking obligations and payments, ordering equipment, processing travel vouchers, etc.) is provided by a newly hired GS-13 executive officer, three GS-9 administrative assistants, and a contractor. A GS-11 production specialist also assists the television operations manager tracking PNN equipment and a contractor assists the staff director with PNN time and attendance. PNN also receives support from the Office of Contracts, the Office of Human Resources, and the office of the Chief Financial Officer (CFO), as well as the VOA Director's office.

Administrative support for PNN has improved over the last few years. On a number of occasions in FY 2006 and FY 2007, Persian Service managers asked POVs to work through purchase orders that were not yet funded or in place, creating unauthorized commitments. In FY 2008, VOA contracting officers reported only one unauthorized commitment, and it was unrelated to POV assignments. Files now generally contain proper supporting documentation. Improvements stemmed from a rigorous training program held in FY 2008 for all VOA administrative officers, assistants, and managers. Both the Office of Contracts and the CFO's office provided training on the steps and supporting documentation necessary to order equipment

and services and to make payments. Improvements also stemmed from the temporary assignment of VOA's most seasoned program manager to that office. The OIG team heard complaints about the timeliness of contractor payments. It is also unclear whether PNN has the correct number of administrative staff.

## Timeliness of Contractor Payments

Although the OIG team heard complaints that POVs were being paid late, over the last year, most were actually paid within 30 days of submitting their invoice as stipulated in their contracts and in accordance with the Prompt Payment Act. When POVs were not paid in a timely manner, it was generally because invoices were not complete. PNN did have some problems paying contractors on time in the months after BBG implemented its new accounting system because staff were learning the new system and processes and the system went down several times. These problems have been largely solved.

## Adequacy of Administrative Officer/Assistant Staffing

A number of staff both within PNN and outside of PNN questioned whether PNN has an adequate number of administrative staff. In 2008, PNN administrative officers incurred about \$22,000 in overtime expenditures and, as indicated, two contractors and a GS-11 production specialist also assist. It was difficult assessing whether PNN had adequate staffing because workload among PNN's administrative assistants did not appear even, though all assistants are graded at the same level. The OIG team is not aware of any review within PNN of the workload across administrative staff, though it may have been difficult in the past to do this given the ramp up. VOA also does not appear to have reviewed administrative officer workload across services. Given the amount of overtime earned in that office and the volume of work, VOA and PNN should ensure that the number of administrative officers within PNN is adequate. The CFO's office could provide the number of invoices processed by each VOA service as a starting point.

**Recommendation 11:** Voice of America should devise some method of measuring administrative officer and administrative assistant workload and then ensure that Persian News Network administrative officer staffing is adequate. (Action: VOA)

## VOA'S NEW YORK NEWS BUREAU

Two OIG team members conducted a site visit of VOA's New York City news bureau on November 14, 2008. They interviewed VOA and PNN personnel and toured the VOA facilities used by PNN. Funds budgeted for PNN were used to construct a second television studio in the New York office. Staff pointed to some technical features that could have been preserved or added during construction of the studio at no additional cost. All agreed, however, that the studio worked and was available for other VOA services as needed. Two journeyman correspondents, whose work earn rave reviews, are assigned to the New York office. Until recently, there was also a cameraman assigned to PNN's New York correspondents, but that is no longer the case, and the OIG team heard that some opportunities for good stories had been lost. Apparently there were discussions between the news bureau and PNN, but no decision had been made about engaging a replacement cameraman. The OIG team made an informal recommendation on this subject.



## MANAGEMENT CONTROLS

### HUMAN RESOURCES MANAGEMENT

#### Recruitment and Personnel Practices

When VOA received supplementary money to significantly ramp up Persian Service, it had to retain sufficient staff to get the work done. Management's focus was understandably directed at getting new programs up and running quickly. To this end, it engaged additional FTEs and contractors. This expedited hiring process helped to create mistrust among some PNN employees and POVs. PNN management is faced with this unnecessary distraction.

#### FTE/POV Distinction

After discussions with FTEs and POVs and review of documents, the OIG team determined that for many FTEs and POVs there is no functional difference in the work they perform. For example, a staffing document indicates that News and Views has 13 FTE and four POVs writers; *Late Edition* has one FTE and 12 POV writers. It is beyond the expertise of the OIG team to judge whether PNN's overall use of FTEs and POVs has in all cases accorded with Office of Personnel Management (OPM) regulations. It is indisputable, however, that the different regulatory regimes governing POVs and FTEs have posed management challenges. For example, FTE workers are required to spend a certain number of hours at the workplace while individual POV contracts stipulate if specified hourly attendance is required. This disparity has created some friction.

Management is responding to these concerns. Management is struggling with problems caused by unscheduled absences on the part of both FTEs and POVs, yet it is constrained to treat people who do essentially the same job differently, depending on their status as a FTE or POV. Establishing the number and makeup of workers needed for each program, as recommended elsewhere in this report, may make this problem easier to resolve. IBB and PNN are working on clarifying procedures for dealing with the distinctions between FTEs and POVs. The requirements for

POVs are written into each individual contract. Performance requirements for FTEs are prescribed by OPM.

## Classification Level of FTE Positions

PNN's FTE positions were generally established at the GS-12 level and above, reflecting the Office of Human Resources and PNN's judgment that PNN needed full journeymen (the standard for GS-12), who could hit the ground running. This classification level obviated the need for a formal skills or language test (that is generally required for GS-11 and below positions), but applicants were required to demonstrate one year of experience at the GS-11 level.

The Civil Service employment system, which governs FTEs, is designed to be transparent and fair and produce a well qualified work force, without regard to political and personal connections of the applicants. However, some PNN employees and contractors felt that PNN hired at the GS-12 level to avoid testing candidates that it favored. Language and skill tests are generally required at the GS-11 level and below. Some PNN employees and contractors also felt that candidates were hired at the GS-12 level because it could be done faster without testing. The Office of Human Resources staff said that these tests could be administered and graded in a 6-week period.

Successful hiring at the GS-12 level for jobs requiring detailed technical skills can be especially challenging, as it is hard to judge mastery of complicated technical skills from job application materials, although the effective use of interviews, work samples, and reference checks can address this challenge. Experienced VOA workers recalled that hiring at GS-9 levels, with language and other skill tests, provided more simple evidence of a basic skill level. It also fit in well with a gradual career progression ladder to higher GS levels. Now that there is less urgency for PNN to hire quickly, management may be more attentive to hiring below the GS-12 level. It may also consider the benefit of using a language test even when hiring at the GS-12 level.

## Transparency/Favoritism

Federal personnel laws and regulations are complicated; personnel complexities for PNN in the last few years were exacerbated under the pressure of quickly building up a staff capable of producing 6 hours of original Persian-language programming daily. PNN staff complained about lack of transparency in hiring. Some characterized personnel practices as driven by cronyism and favoritism. Many said

that no job opened unless management had already chosen its candidate and that promotions and step increases were motivated by favoritism.

In an attempt to understand how these perceptions arose, the OIG team examined a limited selection of human resources records concerning some positions. These show that several persons were hired under the broad position description of International Broadcaster, whose vacancy announcement was open indefinitely. In August 2007, new human resources management decided to discontinue indefinite job openings and applicants were told that the position had closed and all positions had been filled. However, another International Broadcaster position, with a different announcement number but the same job description, opened up again within the month. The new vacancy announcement was viewed with suspicion. As a result, rejected applicants, some of whom already worked at PNN as POVs, were required to go through the tedious process of applying once again. At least one person repeated this process at least twice and eventually got hired.

In another case, an FTE job opening was announced in a timeframe that enabled contractors who were just completing one year of work at PNN to be eligible. The contractors could use their 1 year of contracting experience to fulfill the requirement of one year's experience at the next lower GS level. While this might have been entirely permissible, the practice contributed to a perception that hiring decisions had been made before the job opening is circulated.

VOA could improve the transparency of its human resource decisions by circulating a newsletter with information about job openings, recent hires, promotions, departures or travel assignments or general interest items. The OIG team made an informal recommendation on this subject.

## Executive Producer Positions

PNN's FTE supervising executive producer (GS-14) hired two FTE executive producers (GS-13) who were his colleagues at ABC News. (Other ABC News alumni perform under POV contracts.) A perception of cronyism that can accompany such hiring decisions creates ill will and can hamper the employee's effectiveness in the workplace.

The executive producers, recruited for their long experience in the nuts-and-bolts of commercial television news production, do not have an adequate platform on which to use their skills. Their ability to contribute to the journalistic product and to conduct professional exchanges with their Persian-speaking colleagues, including the managing editors, is limited by language. As one PNN worker put it: "How

could you produce Meet the Press without an English-speaking person in charge?” Through the exercise of good will and professional discipline, the team of a Persian-speaking managing editor and a non-Persian speaking executive producer can work successfully together, but the arrangement is not the optimal long-term solution.

PNN management said that it is very difficult to hire Persian speakers who have experience in television production. In the past, one such person was hired, but a manager told the OIG team that person found the commute from New York City too demanding. Another Persian speaker was on the verge of accepting a position but was afraid to accept the job for fear that there would be retaliation against family members in Iran. VOA management told OIG that most television executive producers throughout VOA do not speak the broadcast languages involved because of the difficulty in finding executive producers who have both the television production expertise and the language skills. In addition, PNN is not necessarily able to compete with the salaries of commercial television.

## Performance Evaluations/Feedback on Job Performance

PNN managers and human resources officials report that PNN conducts annual performance evaluations of its FTEs, as required by law. However, PNN Persian-speaking staff told the OIG team that the employee evaluation process was perfunctory. Some said that they were just given a completed form to sign and were discouraged from reviewing it or adding to it. There were also complaints that there were not opportunities to discuss job advancement and career aspirations with supervisors and that there were not adequate mechanisms to correct problems in job performance. It is difficult to verify these assertions because there is no document that can prove or disprove them. However, a single senior Persian-speaking person supervised the entire Persian-speaking staff. His many duties pose a challenge to close supervision and guidance of the large staff. As recommended elsewhere, PNN should establish appropriate reporting lines that provide for the exercise of supervisory authority over day-to-day performances. In addition, the whole staff and PNN’s products would benefit from a meaningful adherence to the performance evaluation system.

**Recommendation 12:** Voice of America’s Persian News Network should, within 6 months, provide training to managers in conducting annual performance evaluations, specifically discussing the employee’s duties and performance. The training should also instruct first-line supervisors how to conduct interim reviews of job performance and career advancement and how to provide measured feedback to employees at other times, as appropriate. (Action: VOA)

During this inspection, OPM was conducting an evaluation of BBG's use of personnel management authorities of managers and human resources professionals. It was evaluating BBG's human capital programs with a particular focus on strategic alignment, talent management, leadership and knowledge management, and results-oriented performance culture. It reviewed personnel actions and related records. The OIG team was in contact with the OPM team, but the results of its evaluation were not available at the time of this writing.

## Training

Training is important to PNN's ability to fulfill its mission. In the OIG team's discussions with PNN managers, staff, and POVs, a need for training was a constant theme. This includes training in technical skills for journalism, television production, and Internet; training for managers; and team building. When PNN was under pressure to rapidly increase its television capabilities and staff, it was not able to hire enough Persian speakers with the technical skills for television. Likewise, if PNN could find Persian speakers with television skills, they did not necessarily have experience or training in U.S. journalism standards. As PNN enhances its Internet presence, it finds the need to train new employees with limited Internet skills or to retrain former VOA radio broadcasters. Finally, the sheer size of the language service with its generational, political, and cultural mix warrants managerial training to assist with these challenges.

There are different training rules for FTEs and POVs. In general, Federal regulations say that POVs are not eligible for training because they are expected to possess the skills required to provide the product. However, PNN can request an exception to train POVs. The justification is that it is hard to hire people qualified in Persian, and many contractors need to have skills in several areas. The Office of Training works with the Office of Contracts to determine the requirements of such training regulations.

The availability of training is tied to the budget and timing. The budget may fluctuate or be uncertain, particularly during a continuing resolution. Sometimes, individuals find it hard to take off the time to be trained. A good deal of training that occurs in PNN is informal and done by managers or more experienced coworkers. A few new employees said that they had to fend for themselves to learn the ropes. An apparently successful, though limited, option has been the engagement of two television specialists as contractors to assist in television production while mentoring young workers. While this one-on-one approach has received mixed reviews, it appears to raise the bar for coworkers.

Television training is the priority for PNN. The head of VOA's television enhancement team actively participates in prioritizing classes and trying to provide the training that people need. According to IBB's Office of Training and Development, there are numerous relevant technical television courses in its course catalog IBB Broadcast Academy. Courses specifically for production skills are:

- TV01: Basic TV Production Skills
- TVP2: Training for Television Producers
- TVP3: Basic Digital Videotape Editing
- TVP4: Producing TV Stories Using Video Feeds
- TVP5: Digital Video Camera, Audio and Lighting Techniques
- TVP6: Crafting Field Reports with DV Camera Package or Crew
- TVP7: Advanced Digital Videotape Editing for Journalists
- TVP8: Creating Short Feature Stories
- TVP9: Individual VJ Consulting Session

**Recommendation 13:** Voice of America should assess the need for technical production training of the Persian News Network workers and provide appropriate training. (Action: VOA)

Some of the executive producers have received managerial training. This is important for all managers because they are working in a high-stress environment putting shows on the air daily and dealing with two cultures and languages. The OIG team heard repeatedly from workers that the relations between workers and managers were strained, as were the relations among executive producers, managing editors, and anchors. PNN's acting director is trying to improve the situation by bringing together parties who disagree and talking over their differences.

**Recommendation 14:** Voice of America should provide its Persian News Network managers appropriate managerial training to handle the high-stress environment and to deal with two cultures and languages and various political and religious points of view. (Action: VOA).

## Professional Behavior

The daily working environment at PNN at needs serious attention. The OIG team discussed the problem with BBG and VOA senior managers as well as with the many workers who were interviewed. Virtually everyone voluntarily brought up the subject of disgruntled employees and destructive rumors. Some said that it was the most unpleasant place they had ever worked, citing raised voices and the lack of civil, professional conduct when disagreements arose. The OIG team received many unsolicited documents or e-mails full of grievances, some from anonymous writers. The personal questionnaires also gave examples of some workers not showing respect for other workers or managers.

A senior VOA official said PNN's biggest challenge was maintaining an atmosphere of trust and mutual respect. Another hoped that the atmosphere would change when PNN employees were encouraged to tightly focus on creating professional products. It is possible that the situation could be improved if this were the case and if human resource decisions were better communicated to the staff. VOA management and BBG's general counsel are addressing these issues.

The OIG team spoke with IBB's Office of Training and Development about possible ways to improve the situation. An IBB training official said that PNN needs training that gets to the root of problems. IBB training could provide a focused session on team building. It could bring in an outside vendor to meet with the staff and managers to uncover all issues and to listen to employee concerns. Since PNN is so large, not everyone could participate, but there could be representatives from all segments of the operation. One or two town hall meetings would explain what the training was to achieve. It would convey the message that "we hear you and we are working to improve things."

**Recommendation 15:** Voice of America, in coordination with the International Broadcasting Bureau's Office of Human Resources, should provide the appropriate team building training for management and staff to address unacceptable professional behavior in the Persian News Network. (Action: VOA, in coordination with IBB)



## PERSONAL PROPERTY MANAGEMENT

VOA and PNN are accountable for approximately \$400,000 of non-expendable property including, among other items, laptops, desktops, portable hard drives, camcorders, transmitters, and receivers. Most of the equipment listed on PNN's inventory was purchased in 2007 and 2008. Although PNN has some property management procedures in place, PNN's inventory is not accurate and property management controls need strengthening.

When Persian Service moved out of the West and South Asia Division, PNN became responsible for its own property. PNN had difficulty creating its initial inventory list because records in the West and South Asia division were not kept up to date. PNN started with a list of equipment PNN staff reported they had. The current property control officer reported that it took him months just before and after PNN was created to enter equipment into the system. Given competing priorities during the ramp up, PNN staff stated they had limited time to ensure that all equipment in PNN staff's possession was bar-coded and entered into the system. This, coupled with problems IBB- and VOA-wide, brings into question the completeness of PNN's initial inventory.<sup>16</sup>

PNN staff have also had difficulty keeping inventory records up to date. While purchased equipment is generally bar-coded, it is not always entered into the property management system in a timely manner. Property custodian changes are also not kept up to date in the system. Additionally, PNN never finished its March 2008 physical inventory. Although PNN asked all property custodians to verify they had equipment shown in their custody, PNN did not follow up on all missing equipment nor report the items missing. PNN also found equipment during the inventory that was not on their list but never fully resolved why the items were left off.

PNN recently assigned property management responsibilities to a GS-11 production specialist; she is sorting through hand receipts and receiving reports to update the property management system. While the OIG team is encouraged by this assignment, PNN needs to ensure that all nonexpendable property purchased with PNN-allocated funds (including no-year 2006 emergency supplemental funds and normal operating funds) are accounted for. PNN should identify equipment purchases from

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<sup>16</sup>Non-expendable equipment management within BBG, including within PNN, has required attention for the last few years.



obligation reports and delivered equipment serial numbers from receiving reports kept in payment files. The OIG team also made an informal recommendation that PNN report all missing equipment to IBB's Office of Engineering and Technical Services and that PNN ensure that equipment reported in Persian Service staff possession at the time of a 2006 physical inventory, but not the 2008 inventory, has been accounted for.

**Recommendation 16:** Voice of America's Persian News Network should identify all nonexpendable property purchases since 2006 and ensure that property is accounted for in the property management system. (Action: PNN)

It was difficult determining what equipment each PNN employee had access to in order to perform their jobs. Some equipment, such as Windows laptops, are maintained by IBB-Engineering but can be checked out to anyone in VOA. PNN employees, therefore, can check out laptops from both IBB-Engineering and from PNN. Some PNN employees had a Windows laptop from IBB and an Apple laptop from PNN. Additionally, at least one PNN employee from a domestic bureau had used equipment assigned to another VOA service. The OIG team made an informal recommendation that PNN managers ensure they are aware of all equipment employees have access to before assigning them additional PNN equipment.

At the beginning of the inspection, about 31 percent of PNN's equipment was not yet assigned to a property custodian. The PNN director was therefore accountable for this property if it was lost or stolen. Unassigned equipment was being used by POVs, PNN's graphics unit, and PNN radio. During the inspection, PNN designated property custodians for most of this equipment. The OIG team made an informal recommendation that PNN assign property custodians for all equipment.

## FINANCIAL MANAGEMENT AND PROCUREMENT

PNN budgeting from FY 2007 - FY 2009 grew significantly because of the programming and organizational changes that had occurred over that period. PNN's budget is broken down by program or unit using function codes with one overhead category for the Office of the Chief as shown in Appendix C. Changes between FY 2007 and FY 2009 included but were not limited to:

- when PNN became a separate division, the PNN funding was moved out of the West and South Asia Division in FY 2007

- when Radio Farda was consolidated under RFE/RL management, the Radio Farda funding was removed from PNN's budget mid-FY 2008
- graphics unit funding had been included in the Office of the Chief's budget in FY 2008 but was added as a separate function code in FY 2009
- *History Channel, Women's View*, some Persian radio, and some Late Edition expenditures occurring in FY 2008 were funded with the FY 2006 Emergency Supplemental but added to PNN's general operating budget in FY 2009
- *Early Edition* funding was added into the News and Views function code mid-2008

The accounting system conversion occurring in FY 2008 also complicated budgeting. The OIG team believes the stabilization of PNN operations will facilitate budgeting in the future.

As noted, most of PNN's budget is allocated to POV payments. The POV payment files that the OIG team reviewed during this inspection contained proper Authorized Representative of the Contracting Officer (ARCO) signatures denoting that contractor assignments were completed. However, the ARCO's signature was not always legible and the ARCO's name was not printed on the invoices. Additionally, POV contracts did not always contain the name of the ARCO, only the name of the program the POV was working on. The OIG team made informal recommendations regarding both of these issues.

## LIST OF RECOMMENDATIONS

**Recommendation 1:** Voice of America should develop and articulate a statement of Persian News Network program goals and objectives consistent with Voice of America's mission and ensure that it is disseminated and understood. (Action: VOA)

**Recommendation 2:** Voice of America should, as appropriate, revise the Persian News Network's organizational structure to clarify the lines of responsibility and authority. (Action: VOA)

**Recommendation 3:** Voice of America should develop and implement an internal communication plan for the Persian News Network to increase the interaction between its elements, both horizontally and vertically, and to share important information with the staff. (Action: VOA)

**Recommendation 4:** Voice of America should review its programming, including the number of hours, and determine if changes should be made in order to increase quality. (Action: VOA)

**Recommendation 5:** Voice of America should conduct an assessment of the number of workers needed for each of its television programs and allocate its human resources accordingly. (Action: VOA)

**Recommendation 6:** Voice of America should continue to develop and implement a plan to build the Persian News Network's Web presence into an interactive 24/7 operation, with timelines and measurable milestones. This Web presence should complement Radio Farda's Web efforts. (Action: VOA)

**Recommendation 7:** The Broadcasting Board of Governors should, in coordination with Voice of America, in the context of its annual language service review process, determine whether Voice of America radio broadcasting in Persian should be discontinued or reinvigorated. If it is to be reinvigorated, it should be given a clear mission as an integral part of the Persian News Network, along with a clear estimate of resources to accomplish this mission. (Action: BBG, in coordination with VOA)

**Recommendation 8:** Voice of America should develop a plan to create and implement a Persian-language news desk, including a timetable, measurable milestones, and staffing implications. (Action: VOA)

**Recommendation 9:** Voice of America should integrate its Persian-language news desk with its Internet operation, making regularly updated translations of news stories available to the Web site staff on a share drive or an Intranet site. (Action: VOA)

**Recommendation 10:** The Broadcasting Board of Governors should undertake audience research surveys at least twice a year, funding permitting, to have information on audience preferences upon which to adjust its Persian News Network programming. (Action: BBG)

**Recommendation 11:** Voice of America should devise some method of measuring administrative officer and administrative assistant workload and then ensure that Persian News Network administrative officer staffing is adequate. (Action: VOA)

**Recommendation 12:** Voice of America's Persian News Network should, within 6 months, provide training to managers in conducting annual performance evaluations, specifically discussing the employee's duties and performance. The training should also instruct first-line supervisors how to conduct interim reviews of job performance and career advancement and how to provide measured feedback to employees at other times, as appropriate. (Action: VOA)

**Recommendation 13:** Voice of America should assess the need for technical production training of the Persian News Network workers and provide appropriate training. (Action: VOA)

**Recommendation 14:** Voice of America should provide its Persian News Network managers appropriate managerial training to handle the high-stress environment and to deal with two cultures and languages and various political and religious points of view. (Action: VOA).

**Recommendation 15:** Voice of America, in coordination with the International Broadcasting Bureau's Office of Human Resources, should provide the appropriate team building training for management and staff to address unacceptable professional behavior in the Persian News Network. (Action: VOA, in coordination with IBB)

**Recommendation 16:** Voice of America's Persian News Network should identify all nonexpendable property purchases since 2006 and ensure that property is accounted for in the property management system. (Action: PNN)

## INFORMAL RECOMMENDATIONS

Informal recommendations cover operational matters not requiring action by organizations outside the inspected unit and/or the parent regional bureau. Informal recommendations will not be subject to the OIG compliance process. However, any subsequent OIG inspection or on-site compliance review will assess the mission's progress in implementing the informal recommendations.

Proper use of the Persian language is a point of contention and source of friction in PNN. Staff members vary greatly in their connection to and experience with the language. Some left Iran 30 years ago and have not returned. Others left Iran quite recently and are accustomed to contemporary Persian. Still others are native speakers but were born and raised in the U.S., learning Persian from their parents. Going through the process of writing a style manual, and gaining buy-in from staffers to use it, might significantly reduce unnecessary tension.

**Informal Recommendation 1:** VOA should assign Persian News Network staff to write and disseminate a style manual for all persons who translate material into Persian. (Action: VOA)

Producers file a report after each program, but some workers felt the need for more feedback on their technical contributions and a daily system of process assessment.

**Informal Recommendation 2:** Voice of America's Persian News Network should establish a system whereby television producers could immediately give post-show feedback to those who worked on the show. (Action: VOA)

In order to conduct in-country surveys, BBG needs a license from the Office of Foreign Asset Control of the Department of Treasury. There may come a time when the security situation is favorable to in-country audience research.

**Informal Recommendation 3:** The Broadcasting Board of Governors should periodically consider applying for a license from the Office of Foreign Asset Control of the Department of Treasury to enable its audience research contractor to conduct an in-person survey within Iran.

According to recent statistics obtained by VOA, there has been a sharp decrease in visits to PNN's Web site.

**Informal Recommendation 4:** Voice of America, in coordination with the International Broadcasting Bureau, should assess possible technical causes for the decrease in visits to the Persian News Network's Web site.

A good way to obtain input about PNN's Web site is through a customer satisfaction survey.

**Informal Recommendation 5:** Voice of America should create a Web site survey to solicit information about customer satisfaction.

PNN overtime totaled \$151,000 in FY 2008 — an average of \$1,815 per person. Now that the PNN ramp-up is complete, that amount of overtime expenditures may no longer be justified.

**Informal Recommendation 6:** The Voice of America's Persian News Network should review overtime expenditures by individuals and ensure that any authorized overtime is necessary.

VOA's New York news bureau has television studios. Recently the cameraman providing services left his position and was not replaced. Correspondents said that there had been discussions between the news bureau and PNN about hiring a replacement.

**Informal Recommendation 7:** Voice of America's Persian News Network should consider once again providing cameraman services to support its New York-based correspondents.

In spite of OPM regulations, many PNN workers felt that PNN's hiring and availability of positions were not transparent. This appeared to affect staff morale. One way to achieve more transparency and to improve morale in an environment of teamwork is to have a staff newsletter.

**Informal Recommendation 8:** Voice of America should institute an internal newsletter for PNN staff, recording such events as arrivals, departures, job openings, promotions, travel, births, marriages, accomplishments, awards, and other items of general interest.

Equipment that could not be located during PNN's March 2008 inventory was not reported missing or stolen to IBB-Engineering.

**Informal recommendation 9:** Voice of America's Persian News Network should report missing or stolen equipment from the March 2008 physical inventory.

Some equipment shown in Persian Service staff possession during a 2006 physical inventory was not reflected on PNN's 2008 inventory list. During the inspection, PNN staff determined why some, but not all, of this equipment was not on the 2008 inventory list.

**Informal Recommendation 10:** Voice of America's Persian News Network should determine why equipment shown in Persian Service staff possession in 2006 is not reflected on the Persian News Network's 2008 inventory.

PNN employees can check laptops and other equipment out from both PNN and IBB-Engineering.

**Informal Recommendation 11:** Voice of America's Persian News Network should ensure that all managers are aware of the equipment their staff has checked out before assigning them additional PNN equipment.

Some of PNN's equipment, such as traveling laptops, are not yet assigned to a property custodian and are therefore still under the PNN director's accountability.

**Informal Recommendation 12:** The Persian News Network should assign property custodians for all PNN equipment and the custodians should set up a method of tracking who has the items.

POV contracts did not always denote the individuals who could accept POV work as ARCOs. Additionally, ARCO signatures on POV invoices were not always legible nor were the ARCOs' names printed on the invoices.

**Informal Recommendation 13:** Voice of America's Persian News Network should ensure that the Authorized Representative of the Contracting Officer's name is printed on Purchase Order Vendor invoices.

**Informal Recommendation 14:** Voice of America's Persian News Network should request that contracting officers denote in purchase order vendor contracts the individuals serving as Authorized Representatives of the Contracting Officer.





## PERSIAN NEWS NETWORK PRINCIPAL OFFICIALS

<b>Position</b>	<b>Name</b>	<b>Arrival Date</b>
Director	Alex Belida	09/08
Executive Editor	Dr. Kambniz Mahmoudi	10/06
Staff Director	Benjamin Jonas	02/07
Operations Manager	Scot Riddlesberger	05/06
Senior Executive Producer	Joy Wagner	POV 11/05; staff 03/06
Executive Producer	Amy Katz	POV 05/06; staff 03/07
Executive Producer	Gareth Conway	09/08
Executive Producer	Sue Shand	04/08
Executive Producer	Susan Jackson	05/08
Managing Editor	Ali Sajjadi	07/07
Managing Editor	Behrouz Souresrafi	08/07
Managing Editor	Houmoyoun Majd	02/04
Managing Editor	Behrouz Nikzat	POV 03/80; staff 07/80
Managing Editor	Ali Farhoodi	POV 04/80; staff 01/81
Managing Editor	Hossein Kangarloo	12/83
Senior Editor/anchor	Setareh Derakhshesh	02/99

Dates reflect when the staff joined PNN or the Persian Service. Some staff entered duty at VOA in capacities outside of PNN or Persian Service at early dates.



## ABBREVIATIONS

ARCO	Authorized Representative of the Contracting Officer
BBC	British Broadcasting Corporation
BBG	Broadcasting Board of Governors
CFO	Chief Financial Officer
FTE	full-time employee
HR	human resources
IBB	International Broadcasting Bureau
OIG	Office of Inspector General
OPM	Office of Personnel Management
PNN	Persian News Network
POV	purchase order vendor
RFE/RL	Radio Free Europe/Radio Liberty
SMS	short messaging service
VOA	Voice of America



## APPENDIX A: VOICE OF AMERICA CHARTER

To protect the integrity of VOA programming and define the organization's mission, the VOA charter was drafted in 1960 and later signed into law on July 12, 1976, by President Gerald Ford. It reads:

The long-range interests of the United States are served by communicating directly with the peoples of the world by radio. To be effective, the Voice of America must win the attention and respect of listeners. These principles will therefore govern Voice of America (VOA) broadcasts.

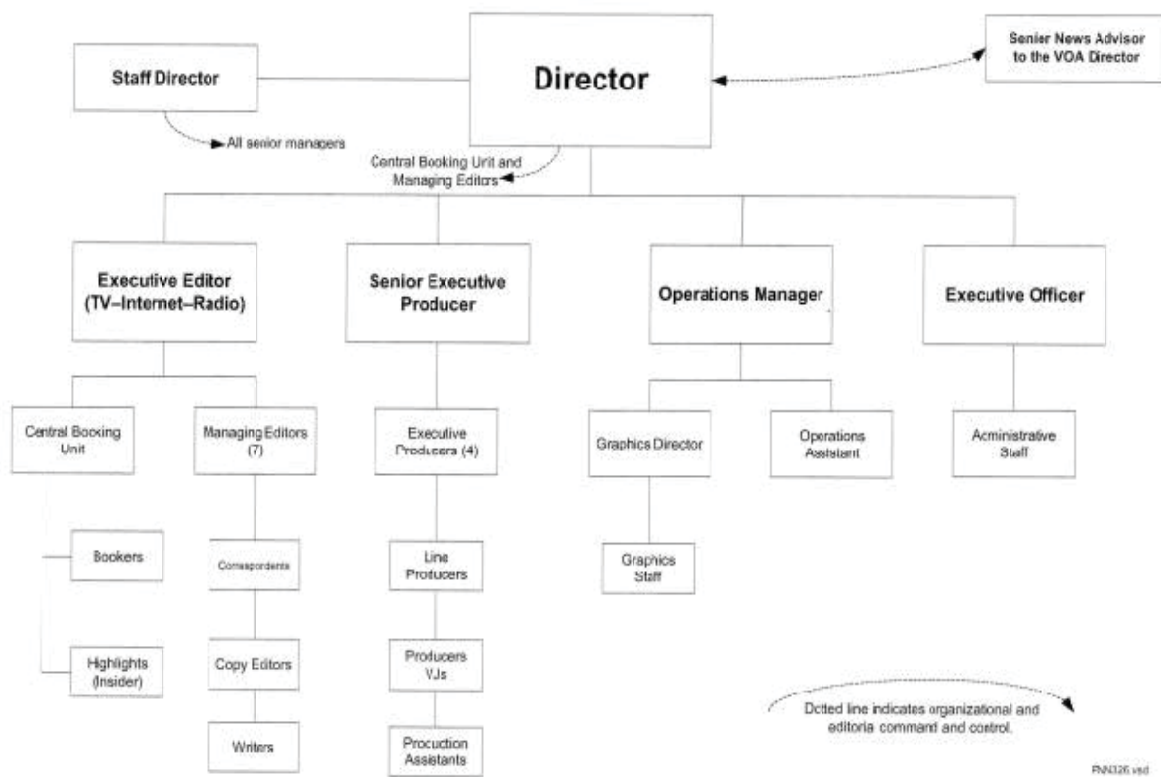
1. VOA will serve as a consistently reliable and authoritative source of news. VOA news will be accurate, objective, and comprehensive.
2. VOA will represent America, not any single segment of American society, and will therefore present a balanced and comprehensive projection of significant American thought and institutions.
3. VOA will present the policies of the United States clearly and effectively, and will also present responsible discussions and opinion on these policies.

*(Public Law 94-350)*





## Persian News Network







## APPENDIX C: PERSIAN NEWS NETWORK FUNDING<sup>17</sup>

<b>PNN Show/Unit</b>	<b>FY 2008 Spending</b>
News & Views	\$1,918,995
Office of the Chief (including remotes)	1,739,403
Women's View	937,420
Broadcasting in Persian Internet & Radio	872,616
Late Edition	770,355
4 <sup>th</sup> Hour Newstalk	412,097
History Channel	408,473
Radio Farda	366,487
Round Table	282,582
New Media Project	102,591
PNN Graphics	74,901
<b>Total:</b>	<b>\$7,885,920</b>

<b>Budget Object Class</b>	<b>FY 2008 Spending</b>
Talent <sup>18</sup>	\$5,129,465
Satellite Transmissions (Remotes)	1,127,000
Other Contractual Services (including acquired programming for the History Channel)	708,614
Travel	356,783
Telephone Tolls	130,274
Overseas Stringers	128,845
Travel Grant	105,641
London Studio	76,762
Office Equipment/Machine	74,183
Other	48,353
<b>Total:</b>	<b>\$7,885,920</b>

<sup>17</sup>FY 2008 Actual nonsalary general operating expenditures provided by the CFO's office.

<sup>18</sup>Payments generally made to POVs. Includes payments for combinations talent, producers talent, Internet POV, and all other talent (Budget Object classes: 2573, 2578, 2580, and 2540).

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