

THE VOICES OF AMERICA IN INTERNATIONAL RADIO PROPAGANDA

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I

HISTORICAL BACKGROUND

A. The Voice of America

Through a soft blanket of static the chords of *Yankee Doodle Dandy* emerge from the speaker of a shortwave radio set. The tune is crisp and confident; and it is followed by a pleasant but authoritative voice which declares, "This is the Voice of America." With this introduction, the "Voice" begins each of its transmissions of news, commentary, and educational programming. The transmissions are repeated numerous times daily in a multitude of languages over relay transmitters located throughout the world.

The Voice of America (VOA) is the "official" spokesman of the United States government in the arena of international shortwave radio. But despite its popularity throughout the world and the millions of dollars of public funds that comprise its yearly budget, the Voice is little-known and even less understood in its home country because few Americans, outside of radio fanatics, listen to shortwave broadcasts.

Those who do tune in to the Voice are first greeted with the news and political commentary one might expect from a government broadcasting outlet. But the efforts of a more patient listener might be rewarded with a lively program of American jazz music or perhaps a feature on one of the fine arts. The listener might also hear programs dealing with such diverse topics as agriculture, medicine, and travel in America. An attempt is made to convey the popular aspects of American culture in addition to voicing political views.

The Voice had its birth during the propaganda battles of World War II. The world war then gave way to the Cold War and to the specter of a new and powerful enemy. It was felt that the forces of democracy needed a shortwave arsenal to combat the thundering propaganda brigades of Russian communism, so the Voice was continued during peacetime under the authorization of the Smith-Mundt Act of 1946.¹ Until October 1948, programs were prepared under contract by the NBC and CBS radio networks; after congressional criticism of certain broadcasts

to Latin America, however, the State Department assumed the programming function.² The Voice was operated by the State Department until 1953 when it was placed under the control of the newly created United States Information Agency (USIA).³ This new agency's mission was to keep the world favorably informed about the lifestyle and citizens of the United States through magazines, films, and press releases, as well as through shortwave broadcasts over the VOA. As part of the USIA, the Voice has grown into one of the largest and most sophisticated communications enterprises in the world, presently employing over 2,000 people, many of whom are foreign nationals.⁴

The bureaucratic location of the Voice changed once again in 1978 during a reorganization effort by President Carter. The USIA was joined with the State Department's Bureau of Educational and Cultural Affairs to form the International Communication Agency. This was accomplished under Executive Order 12048, which stated as the dual purposes of the new agency:

To tell the world about our society and policies—in particular our commitment to cultural diversity and individual liberty.

To tell ourselves about the world, so as to enrich our own culture as well as to give us the understanding to deal effectively with problems among nations.⁵

Recommendations over the years that the Voice be established as an independent news agency have consistently been rejected.⁶

Unlike privately owned international shortwave stations,⁷ the VOA is not subject to the rules and licensing procedures of the Federal Communications Commission.⁸ Moreover, not all of the Voice's employees are journalists by trade: about twenty-five important jobs are filled by career members of the foreign service.⁹

The Voice is on the air approximately 830 aggregate hours per week in thirty-eight languages, including Swahili, Thai, and Hausa, a black African dialect.¹⁰ Its physical hardware includes five transmitters in the continental United States,¹¹

2. N.Y. Times, Oct. 1, 1948, at 6, col. 7.

3. See N.Y. Times, Aug. 2, 1953, at 4, col. 3.

4. See Roberts, *New Image for Voice of America*, N.Y. Times, April 13, 1980, § 6 (Magazine), at 107, 108.

5. 22 U.S.C. § 1461 (1979).

6. See, e.g., N.Y. Times, May 29, 1977, at 5, col. 1.

7. At the present time, there are only three such stations broadcasting from the United States. World International Broadcasters in Red Lion, Pennsylvania, and the Family Radio Network, with offices in Oakland, California, and transmitters in Massachusetts and Florida, broadcast programs of a religious nature, while station KGEI in Redwood City, California, is "dedicated to the purpose of promoting goodwill, better understanding and friendship amongst the peoples of the Americas." 1978 WORLD RADIO-TV HANDBOOK 265.

There is also the American Forces Radio and Television Service. AFRTS broadcasts are designed to keep U.S. military personnel stationed overseas informed about news and current events at home. All programs are in English, and newscasts are largely adapted from the dispatches of major networks and wire services. *Id.* at 263.

Since the scope of this paper is limited to the role of the U.S. Government in influencing world opinion by radio, these stations will not be treated here.

8. 47 C.F.R. § 73.701(a) (1979).

9. Roberts, *supra* note 4, at 111.

10. *Id.* at 108.

11. Located at Greenville, North Carolina; Bethany, Ohio; Delano, California; Dixon, California; and Marathon, Florida. 1978 WORLD RADIO-TV HANDBOOK 259.

and eight relay transmitters spread across the globe.¹² These relay transmitters pick up Voice programs and rebroadcast them, obviously with greater regional effectiveness. In addition to its own efforts, it is estimated that over 4,000 mediumwave stations¹³ throughout the world rebroadcast certain VOA programs.¹⁴ It has also been estimated that the VOA reaches a weekly audience of some 80,000,000 people.¹⁵

B. Radio Free Europe and Radio Liberty

Radio Free Europe and its sister station, Radio Liberty, are also children of the Cold War. Radio Free Europe (RFE) took to the air on July 4, 1950, broadcasting "behind the Iron Curtain" to Bulgaria, Czechoslovakia, Hungary, Poland and Rumania in the native tongues of those countries.¹⁶ RFE serves these same countries today. Headquartered in Munich, the location of RFE's transmitters was at first kept secret to minimize jamming. One commentator, many years later, dramatically recounted that the first broadcast "was made with a 7½ kilowatt transmitter from the back of a surplus Army truck on a lonely road outside Frankfurt."¹⁷ Whether or not this is true, it is clear that RFE's early broadcasts consisted largely of inflammatory anticommunist propaganda. Radio Liberation, as Radio Liberty (RL) was then called, began broadcasting on March 1, 1953.¹⁸ A companion station to Radio Free Europe, its attentions were focused on the Soviet Union, to which it still beams programs in eleven Russian dialects.¹⁹

Whereas the Voice of America is the official spokesman of the American government, RFE/RL was intended to operate as the voice of private U.S. citizens. Both RFE and RL were initially structured as private foundations, organized by interested businessmen and former military and intelligence personnel. The National Committee for a Free Europe, RFE's parent organization, counted among its founding members Allen Dulles and Generals Lucius D. Clay and Dwight D. Eisenhower.²⁰ The founders envisioned a system supported by donations from businesses and private individuals, "with the public at large invited to participate through individual subscription."²¹

The perceived advantages of such a private structure should be obvious. The Voice of America, as official spokesman of the U.S. Government, was thought to be restricted by rules of decorum and protocol from fully expressing American sentiments during the Cold War period. Any government mouthpiece would tend to be more moderate in tone, not wishing to stir international turmoil. A private

12. Relay transmitters are located in Germany, England (2), Greece, Liberia, Morocco, the Philippines, and Sri Lanka. *Id.*

13. Mediumwave frequencies are those commonly known as the AM radio dial.

14. Gould, *Is America Speaking with the Right Voice*, N.Y. Times, Jan. 12, 1969, § 2, at 19, col. 1.

15. Roberts, *supra* note 4, at 112.

16. 1978 WORLD RADIO-TV HANDBOOK 103.

17. *A Voice That Pierces the Iron Curtain*, NATION'S BUS., Aug. 1970, at 70, 71.

18. *Id.*

19. See 1978 WORLD RADIO-TV HANDBOOK 102.

20. Gould, *Radio Free Europe*, N.Y. Times, July 9, 1950, § 2, at 9, col. 1.

21. *Id.*

spokesman, however, not subject to the niceties of foreign policy, could afford to be much less inhibited.²²

The focus of RFE/RL also differs from that of the VOA. Programming concentrates on the internal affairs of the Soviet Union and its East European satellites in an attempt to spur internal reform. To this end, the staff is composed largely of emigrés from the target countries. The idea is to achieve "empathy in communication" by having "Poles talking to Poles and Bulgarians to Bulgarians, not as spokesman for some foreign government but as fellow countrymen concerned with the best interests of the country they and their listeners call home."²³ Not surprisingly, the "best interests" espoused by these "fellow countrymen" closely mirror the anticommunist ideals of the stations' supporters.

At the outset, there were high hopes for Radio Free Europe and Radio Liberty. One commentator said of RFE, "It promises to be one of the unique operations in the history of broadcasting."²⁴ This statement was prophetic, but in a manner that its author probably never anticipated. The same writer remarked, "[H]ere is one project that will be successful only if it is sustained by private enterprise, since any government subsidy would destroy its basic appeal."²⁵ This statement, too, exhibits a great deal of irony when read in light of subsequent discoveries about RFE/RL.

The two stations rumbled along for almost two decades under the notion that their financing was completely private. The virulence of their propaganda vacillated over the years with changing views of world affairs, but their purpose and approach remained the same. Periodic rumors about CIA involvement in the stations' operations were quickly dismissed. Then, in 1971, the floodgates opened to reveal a wealth of evidence that the stations had indeed been covertly financed by the CIA.²⁶ It became apparent that over the course of twenty years these "private" stations had received about \$500,000,000 in U.S. Government funds.²⁷

These revelations led to heated debates about whether to continue the operation of these stations. Senator Fulbright, chairman of the Senate Foreign Relations Committee, spearheaded a campaign to cut off all funding to the stations, thereby closing them down.²⁸ Speaking before the Senate, Fulbright echoed the

22. See Rowson, *The American Commitment to Private International Political Communications: A View of Free Europe, Inc.*, 31 LAW & CONTEMP. PROBS. 458 (1966).

23. *Id.* at 461-62. This same sentiment has been expressed elsewhere: "From the standpoint of the listener in those countries, it is the hope of Radio Free Europe that the difference will be that of hearing from a member of the family rather than from a neighbor." Gould, *supra* note 20. See generally Ronalds, *Voices of America*, FOREIGN POLICY, Spring 1979, at 154.

24. Gould, *supra* note 20.

25. *Id.*

26. One scheme, for example, involved the funnelling of funds from the CIA through a series of foundations and charities to RFE/RL. In 1967, the Hobby Foundation of Houston admitted its involvement in such a pass-through scheme. Money was passed from the CIA through a dummy foundation to the Hobby Foundation; Hobby then transferred the funds to RFE/RL under the guise of a charitable contribution. In 1964, for example, \$40,000 was conveyed by Hobby to RFE in this manner. When the existence of this scheme was made public, William P. Hobby, Jr., chairman of the foundation, remarked, "We are glad to have done it and proud to have been of service to the Federal Government." N.Y. Times, Feb. 21, 1967, at 32, col. 5.

27. N.Y. Times, March 12, 1972, at 1, col. 4, 12.

28. See generally Kamm, *The Station That Fulbright Wants to Shut Down*, N.Y. Times, March 26, 1972, § 6 (Magazine), at 36.

sentiments of many when he declared, "Mr. President, I submit that these radios be given an opportunity to take their rightful place in the graveyard of cold-war relics."²⁹

Senator Fulbright's efforts, however, proved unsuccessful. In June 1972 his committee voted to approve a temporary extension of funding for one year.³⁰ This set a precedent which virtually assured the continued existence of the stations; it was clear, however, that government financing would have to be more open in form.

In October 1973 Congress created the Board for International Broadcasting (BIB), "in order to provide an effective instrumentality for the continuation of assistance to Radio Free Europe and Radio Liberty."³¹ The Board, appointed by the President, consists of five members, no more than three of whom may be from the same political party. The directors of Radio Free Europe and Radio Liberty are *ex officio* members of the Board.³² The Board is authorized to make grants to the stations and to receive private contributions.³³ It may also "develop and apply such evaluative procedures as the Board may determine are necessary to assure that grants are applied in a manner not inconsistent with the broad foreign policy objectives of the United States Government."³⁴

The source of funding, then, is really no different now than it was in the past: a good deal of the operating budget is supplied by the government, with the remainder coming from private contributions. The government financing is, however, more open. Consequently, BIB, as an agent of the government, must assume an editorial posture. The directive compelling BIB to apply grants in a manner "not inconsistent with foreign policy objectives" imposes upon RFE and RL some of the same burdens felt by the Voice, the very restrictions sought to be avoided by organizing the stations as private enterprises.

Nevertheless, Radio Free Europe and Radio Liberty operate as an effective supplement to the VOA in spreading American viewpoints. In their capacity as the nonofficial "voice" of America, it is estimated that these stations reach a weekly audience of nearly 33,000,000 people.³⁵

II

TWO MODELS

But what, one might ask, is the driving force behind this massive expenditure of money and manpower? What is the need for an international broadcasting organ? The answer to such questions often takes the form of lofty platitudes

29. *Id.*

30. The amount appropriated for this continued year of operation was \$38.5 million. N.Y. Times, June 8, 1972, at 1, col. 7.

31. Board for International Broadcasting Act of 1973, 22 U.S.C. § 2871 (1979).

32. 22 U.S.C. § 2872 (1979).

33. 22 U.S.C. § 2876 (1979).

34. 22 U.S.C. § 2873 (1979).

35. Roberts, *supra* note 4, at 112.

expressing unassailable ideals,³⁶ but the controlling concept is that providing information to the world's populace will foster the cause of peace. This concept is one of the basic tenets underlying the International Covenant on Civil and Political Rights.³⁷ Article 19 of this UN-sponsored agreement provides: "Everyone shall have the right to freedom of expression; this right shall include the freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers" ³⁸ A greater flow of information should lead to increased understanding among nations, and understanding in turn leads to a reduced possibility of conflict. Zbigniew Brzezinski, National Security Advisor to President Carter, described international broadcasting as "people-to-people" rather than "government-to-government" communication.³⁹

It should be clear, however, that these broadcasts also serve a much more pragmatic purpose.⁴⁰ The primary goal of international shortwave broadcasters is to manipulate world public opinion to create a favorable impression of the station's sponsor.⁴¹ This task, of course, may be accomplished in a number of ways. The American stations in question, however, have generally taken one of two basic approaches. These divergent approaches generally reflect the traditional historical differences between the operating theory of the Voice of America on the one hand, and of Radio Free Europe and Radio Liberty on the other. For the sake of convenience, these theories will be referred to as the VOA model and the RFE model, although neither station has always remained within the confines of its own model operating theory.

A. The VOA Model

Under the VOA model, an attempt is made to inform the world about the United States, "to portray the variety and uniqueness of American society."⁴² It is hoped that educating the listener about life in the United States will create a sympathetic understanding of its people and their beliefs. The spirit of this approach

36. For example, "[s]peech is an instrument of communion and understanding . . . it is the best hope of brotherhood and peace." J. TUSSMAN, *GOVERNMENT AND THE MIND* 124 (1977).

37. 16 U.N. GAOR, Annex 1 (Agenda Item 35) at 2, U.N. Doc. A/5000 (1961-62).

38. *Id.* Note that the covenant is nothing more than a recommendation or a statement of policy; it does not have the force of law.

39. See *Another White House Move That's Riling the Russians*, U.S. NEWS & WORLD REPORT, April 18, 1977, at 25.

40. As a popular Russian radio commentator once wryly observed, "The operators of those radio stations, I can assure you, are practical people. They would never dream of spending hundreds of millions or even billions of dollars just to entertain listeners in Saldus, Latvia with pop music or to give them objective news about what is going on in the world." N.Y. Times, Aug. 21, 1973, at 4, col. 3.

41. This manipulation of opinion is not as easy as it may at first appear. A news story, in particular, must often contain a great deal of background information if a foreign listener is to discern its "proper" meaning. For example, if a broadcast were merely to repeat American press accounts of certain events, the impression conveyed to the average foreign listener might be distorted. "It thus becomes a function of [these stations] to place the news in context, to report [for example] the facts of rioting in the Watts district of Los Angeles, then try to explain why the Watts rioting occurred, and finally to place this event and its causes within the context of the evolution of American society and the changing relationship of the American Negro to his fellow Americans. It would be misleading if any of these elements of the story were reported without the others." Davies, *The American Commitment to Public Propaganda*, 31 LAW & CONTEMP. PROBS. 452, 456 (1966).

42. Stanton, *Separating American Messages*, N.Y. Times, July, 19, 1975, at 23, col. 5.

was perhaps best explained by R. Peter Straus, who stated upon assuming the directorship of VOA in 1977: "I really foresee taking a highly professional group of people and trying to excite them about making the freest democracy in the world understandable to the rest of the world—not necessarily loved by, nor even necessarily liked by but *understood* by the rest of the world."⁴³ The approach is open, honest, and positive. If the truth is known about the United States, it will be better liked and respected. The idea is to establish a "constructive dialogue" with the rest of the world and to influence by "setting a good example."

B. The RFE Model

The RFE model, by contrast, is more heavy-handed.⁴⁴ The aim is to provide a surrogate free press in countries where the local media are shackled by government suppression. The president of Radio Free Europe's founding organization was quoted as saying, "A prime objective . . . will be to bring to these peoples the voices of their democratic leaders who have been driven into exile by Communist oppression."⁴⁵ While VOA essentially endeavors to tell the rest of the world about the United States, RFE attempts to tell the people of Eastern Europe and the Soviet Union about themselves.⁴⁶ Radio Liberty, for example, has twice offered its listeners a cover-to-cover reading of Aleksandr Solzhenitsyn's *Gulag Archipelago*.

It is hoped that the information provided under the RFE model will bring about internal changes in Soviet bloc countries which are favorable to the cause of democracy. "By broadcasting to East Europe, the Western powers hope to participate in, if not encourage, a state of affairs leading toward a change in the relation

43. N.Y. Times, June 30, 1977, at 3, col. 4.

44. Robert Lang, the first director of RFE, boldly proclaimed, "Radio Free Europe is not adverse to being impudent if it will make the Russians wince." Gould, *supra* note 20. The New York Times, in an article dealing with the maiden broadcast of Radio Liberation, unabashedly reported that the station would beam "psychological warfare material" to listeners in the Soviet Union. N.Y. Times, March 1, 1953, at 34, col. 1.

45. N.Y. Times, July 3, 1950, at 1, col. 6.

46. The difference in ideology between these two stations is manifest in their official statements of purpose. A federal statute describes the role of the Voice of America as follows:

(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 discussion and opinion on these policies.

22 U.S.C. § 1463 (1979).

The fundamental purposes of Radio Free Europe, on the other hand, were summed up in a 1962 publication by its parent organization:

To support the aspiration of the Communist ruled people in East Europe for the restoration of their individual rights, political liberties and national independence;

To serve as a free press and radio and to provide public discussion of important issues which the captive people are denied by their Communist regimes;

To maintain pressure on the Communist regimes to correct the conditions under which their subjects are forced to live;

To report and analyze significant developments, such as the growth of the European Community, which—by shifting the balance of power—may lead ultimately to the regaining of national independence for the eighty million people in captive countries.

Powell, *The Czech Crisis and International Broadcasting in Perspective*, 23 FED. COM. B.J. 3, 11-12 (1969).

of citizen and state."⁴⁷ The objective is to keep alive in these countries the hope of eventual freedom from communist rule.⁴⁸ Partly for this reason, no doubt, Radio Free Europe and Radio Liberty have been subjected to much more extensive jamming than has the Voice of America.⁴⁹

III

COMPARING THE MODELS

If the free exchange of ideas is truly being sought, the VOA model is the more commendable approach. The listener is not bombarded with rhetoric, but is merely given information which he can evaluate and compare with that received from other sources. This approach is clearly more in line with our domestic ideals of free speech and a free press. It embodies the "marketplace of ideas" theory of Justice Holmes,⁵⁰ in which "truth" will always prevail in an open contest between competing ideas.

A. The RFE Model

1. *Objectivity and the RFE Model.* A glaring inconsistency in the RFE model is its resort to the very methods of persuasion that its broadcasts purport to combat. Proponents of this model mention, as a justification for their efforts, a desire to free the people of Eastern Europe from narrow and prejudicial accounts of history and world affairs. These same proponents often complain that broadcasts are not forceful enough, that they contain too much criticism of American society. Obviously there is contradiction and hypocrisy here—hard-line advocates of the RFE model wish to sell democratic ideals by relying on oppressive methods of content control.

This curious contradiction might be explained in part by the historical genesis of the RFE model. Its approach toward international broadcasting flourished, in its most extreme form, during the early 1950's. It reflected a perceived life and death struggle between democracy and communism, in light of which all issues were viewed as black or white. While this world view may seem somewhat rigid in the 1980's, there are still those who adhere to it. In a recent speech, former VOA director Kenneth Giddens suggested that Radio Moscow was "seeking to convey the most favorable impression of [the Soviet Union], while at the same time depicting the United States of America as a heartless, grasping, imperialist scoundrel, intent only on exploiting the other peoples of the world."⁵¹ This statement was made during a speech advocating increased spending and a tougher editorial stance in order that American stations could neutralize and eventually defeat Radio Moscow in the crucial "war" for the control of minds. In this same speech,

47. Powell, *supra* note 46, at 21.

48. See J. WHITTON & A. LARSON, PROPAGANDA: TOWARD DISARMAMENT IN THE WAR OF WORDS 51-52 (1964).

49. Except for isolated incidents, VOA broadcasts have not been subject to jamming since 1973. See Roberts, *supra* note 4, at 112.

50. See *Abrams v. United States*, 250 U.S. 616, 630 (1919) (Holmes, J., dissenting).

51. Giddens, *The War We Are Losing*, VITAL SPEECHES, May 15, 1978, at 477, 478.

Giddens proclaimed that “the masses of mankind should understand that America’s ideals are lofty and unselfish . . . that we do not seek to impose our power on other peaceful and law-abiding nations; and that we seek only freedom, justice and prosperity for all men.”⁵²

The most extreme manifestations of the RFE model seem to miss the essential point of free speech: the goal is not to insure that any one viewpoint prevails, but rather that all viewpoints are expressed so that an issue may be intelligently considered. It is one thing to attempt to paint a favorable picture of the United States; it is quite another to create an aura of American infallibility in which all of its opponents are portrayed as evil and grasping. It might be wise to recall the admonition of John Stuart Mill that, in the free competition of ideas, the worst offense “is to stigmatize those who hold the contrary opinion as bad and immoral men.”⁵³ In the zealous effort to promote the American form of government, care must be taken to avoid merely substituting one set of burdensome restraints on freedom of thought for another.

It may be argued by some that the ends justify the means—political freedom is such an important goal that achieving it by undemocratic means is appropriate. But this takes the rather presumptuous view that America knows what is best for everyone, and that democracy is universally the most desirable form of government. This immodest appraisal of the merits of the U.S. constitutional structure fails to take into account “the distinction between universal and local legitimacy.”⁵⁴ Take, for example, “a community barely emerging from a divisive ordeal . . . and making its way precariously toward civility.”⁵⁵ Such a community may not be able to afford the luxury of free speech—respect for authority may, in fact, be its only hope for survival. “Truth . . . may be quite beside the point, for it is believed, and it may be possible, that the harm done to the community by discrediting authority may exceed the harm done by its unpublicized vice.”⁵⁶

The primary justification for a system of free speech is that it makes the populace better able to undertake the responsibilities of self-government. In a society where the people do not govern themselves, however, freedom of speech may be largely irrelevant.⁵⁷ The RFE model’s concern with establishing a surrogate free press thus seems misplaced. Or is it? Clearly, the underlying reason for creating this free press is the hope that it will lead to the displacement of communism and the establishment of more democratic rule in Soviet-bloc nations.⁵⁸ Stimulation of

52. *Id.*

53. MILL, *On Liberty*, in *SELECTED WRITINGS* 350 (P. Wheelwright ed. 1935).

54. TUSSMAN, *supra* note 36, at 128.

55. *Id.* at 89.

56. *Id.* at 90.

57. See A. MEIKLEJOHN, *FREE SPEECH AND ITS RELATION TO SELF-GOVERNMENT* 100-01 (1948).

58. [T]he specific reasons by which the Western powers have continuously justified broadcasting across national boundaries into this sphere of political rule which is clearly hostile to such radio communication . . . are: (1) East Europe is in a state of change, slow or accelerated, depending on the political leadership and the population of each nation; (2) this change, when reflected in greater political freedom and economic reform, can represent a clear and present danger to Soviet domination; (3) the Soviet Union is willing to exert military power in this limited area to maintain her dominance and to restrict threatening economic and political reforms; (4) the Western powers, realizing the primacy of Soviet rule based on territorial proximity, the results of former [sic] agreements (tacit and otherwise), and the advantages of a buffer zone to absorb direct East-West confrontation, cannot resort to

thought is only a necessary step in the process of stirring political and social reform.

2. *The Law of Nations.* But the advocacy of such upheaval, however subtle and indirect, approaches the realm of activities proscribed by international law. The International Covenant on Civil and Political Rights and similar documents authorize the transmission of information and ideas across national boundaries without the consent of the government of the receiving state. But this right is not unlimited; the Covenant does not authorize activities violative of the United Nations Charter.⁵⁹ The latter provides, in part, that “[a]ll members shall refrain in their international relations from the threat or use of force against the territorial integrity or political independence of any state”⁶⁰ Broadly construed, this prohibition may be held applicable to radio advocacy designed to overthrow communist rule in the receiving state.

Whitton and Larson, in their definitive study of propaganda,⁶¹ seem to agree with this theory. They contend that a brand of communication labelled “subversive propaganda” is violative of the principles of international law. Propaganda is “subversive” if it is “calculated to overthrow the existing internal political order of the state.”⁶²

RFE advocates argue vehemently that they are not engaged in the overthrow of one form of government for another, but are merely trying to inject some element of choice into the system. In the words of Robert Lang, RFE’s first director, “All we emphasize is that winning back their freedom is their common problem. After they get their countries back, it’s up to their own people to decide what to do.”⁶³ But can we accept the proposition that, having succeeded to this point, American propagandists would sit idly by and let the people choose a nondemocratic form of government? More fundamentally, does the right to choose not itself imply something of a democratic structure?

The comments of Professor B.S. Murty provide some insight into this situation:

In recent years claims have been frequently put forward that it is right to use nonviolent instruments of policy—in particular, the ideological instrument—to promote self-determination of groups . . . threatened with deprivations of values by the majority groups in those foreign states, and to promote human rights in general Self-determination as a general principle of world community policy is now disputed by few As a symbol, “self-determination” conveys the idea of wide sharing of human values, and so it remains a convenient one to manipulate at all times in ideological strategy When an external elite professes . . . to promote self-determination, it becomes necessary to question whether

military force. Under these imposed conditions, international broadcasting offers a means of . . . encouraging freedom and stability in the area without the threat of direct military reprisal [sic]. Powell, *supra* note 46, at 7-8.

59. 16 U.N. GAOR, *supra* note 37; see Rowson, *supra* note 22, at 466.

60. U.N. CHARTER art. 2, para. 4.

61. WHITTON & LARSON, *supra* note 48.

62. *Id.* at 83. The authors recognize the inherent difficulty in drawing a line between such subversive activity and activity designed merely to provide moral support for an existing movement in the receiving country. *Id.* at 136.

63. Gould, *supra* note 20.

its real objective is promotion of a wider sharing of human values . . . or whether it is using the symbol to promote a strategy of self-extension by highly coercive means.⁶⁴

It would be difficult to argue that, under the RFE model, international broadcasts are not motivated at least in part by the latter objective, thus placing them in contravention of international law.

Indeed, the United States was subjected to severe international criticism after one incident in which a RFE broadcast apparently crossed this fine line between information and advocacy. Just before the Hungarian revolution in 1956, certain RFE broadcasts sounded as though they were encouraging the people of that country to revolt; during the subsequent uprising, "a number of broadcasts indicated strongly, even after resistance was doomed, that if the rebels held out a few more days, help would arrive."⁶⁵ When no aid appeared from the West, a deep feeling of betrayal arose. The resulting disillusionment with the United States and its allies lingered for many years.⁶⁶ After this harrowing incident, RFE consciously softened its editorial stance. During the Soviet invasion of Czechoslovakia in 1968, the directors of Radio Free Europe took pains to purge its broadcasts of even the slightest intimation that help from the United States was forthcoming.⁶⁷

3. *Moral Constraints.* Even beyond the doubtful legality of such advocacy, there are compelling moral reasons for exercising restraint in this area. This fact has been acknowledged by the chairman of the board of RFE/RL, Inc.:

We carefully refrain from in any way inciting any kind of specific action The reasons . . . are both moral and practical As broadcasters from the outside, we have no real power on the inside. It would be sheer irresponsibility on our part to goad people into actions for which they might personally suffer while we are unable to do anything to help them.⁶⁸

These legal and moral constraints may have had some effect on the tone of RFE/RL broadcasts, but the revelation of government financing more than anything else forced the stations to scale down their rhetoric. The 1973 legislation that created BIB made it clear that this agency was to keep program content in line with U.S. foreign policy objectives.⁶⁹ In the era of détente, this clearly meant a more conciliatory posture toward East-West relations. Although the stations have not become an "official spokesman" like VOA, the conspicuous role now played by the government has caused a curtailment of some of the hijinks indulged in previously.⁷⁰

But even absent direct involvement, the government should have some interest in keeping these stations temperate in tone. Beyond the obvious fact that even

64. B. MURTY, PROPAGANDA AND WORLD PUBLIC ORDER 175-78 (1968).

65. Kamm, *supra* note 28, at 112.

66. See generally *A Voice That Pierces the Iron Curtain*, NATION'S BUS., Aug. 1970, at 70, 72; Kamm, *supra* note 28, at 112.

67. Powell, *supra* note 46, at 16.

68. Mickelson, *Filling the Information Gap*, VITAL SPEECHES, July 1, 1978, at 573, 574.

69. See Board for International Broadcasting Act, 22 U.S.C. § 2871 (1979).

70. Radio Free Europe's first director felt that the freedom to bait U.S. enemies was one of the station's greatest assets. "As an illustration, he said that a speech by Ana Pauker, communism's leading lady in Rumania, might be recorded and then played back on the air piece-meal, with a commentator wryly interrupting to tell what the real truth was." Gould, *supra* note 20. Obviously, a government-sponsored station will refrain from such bold parody.

private stations are thought to represent American viewpoints, some scholars believe that a country may be held liable under international law for certain actions undertaken by its private citizens. Whitton and Larson argue that a state is responsible for "pernicious" radio propaganda broadcast by its nationals. Although there is no similar liability for written propaganda, radio broadcasts are thought to be a different matter. It is felt that radio propaganda is far more dangerous than that of a written nature; the spoken word is inherently more forceful and the host country is almost powerless to block the influx of these radio waves. Moreover, a nation exerts considerable control over its private broadcasters through the licensing mechanism.⁷¹ It would seem that a broadcast should be found "pernicious" only in extreme cases and it is not clear whether RFE or RL have ever violated this standard. Nonetheless, this discussion demonstrates that a country's ability to propagandize through the vehicle of "private" stations may not be without limits.

The RFE model, then, does not appear to be consonant with American democratic principles. It represents a narrowness of thought and a force-feeding of ideas that are manifestly incongruent with the most basic of American ideals. The model does indeed appear to be a relic from a darker era of world affairs.⁷² Moreover, it implicates the United States in behavior that, under international law, is at best only marginally legal.

B. The VOA Model

1. *Pedagogy or Propaganda?* The VOA model remains true to the concept of a free exchange of ideas. Yet this model is not without its flaws. The problems with the VOA model arise not so much from the model itself, but from the manner in which it is often implemented. VOA purports to tell the world about the United States and to give its listeners objective news reports. Its efforts, however, have traditionally focused very heavily on the Soviet Union and Eastern Europe, with much less emphasis on the African and South American services.⁷³ The conception that these Soviet-bloc nations require more "information" shows a considerable propagandist bent. Indeed, operation of the Voice of America often seems to spill over and incorporate some of the elements of the RFE approach. Malcolm Toon, former U.S. Ambassador to Moscow, for instance, complained to the Carter administration that VOA newscasts contained "excessive" coverage of dissident news, coverage that was "out of proportion" with the rest of the news.⁷⁴

VOA has recently made an effort to expand its services to Africa.⁷⁵ Third World leaders still complain, however, that U.S. broadcasters are smug and pater-

71. See WHITTON & LARSON, *supra* note 48, at 159-64.

72. With the growing conservative movement in this country, however, the pendulum may have begun to swing back in the other direction.

73. See Roberts, *supra* note 4, at 108.

74. *Id.* at 114.

75. "V.O.A. has tripled its African audience in the past decade when it began improving news coverage of the continent and scheduling more entertainment." Clarke, *Babel in the Ionosphere*, TIME, Jan. 12, 1981, at 43.

nalistic. Such paternalism is evident in a 1976 speech by then VOA director Kenneth Giddens:

There is a feeling among many of us involved in the enterprise that we are engaged in helping to lift the veil of ignorance from the brows of masses of men and women in almost every corner of the earth. If this sounds pretentious, even boastful, I am sorry but I know that it is true.⁷⁶

It is not surprising to find Third World leaders chafing at such an attitude.

The crux of their complaint is that Western broadcasters are insensitive to the needs and values of the developing world. Most of the news reflects Western interests, which are at best irrelevant to Third World society.⁷⁷ A common complaint is that the few stories dealing with Third World events focus not on the region's development projects, but rather on sensational occurrences which reinforce the stereotype of Third World cultures as primitive. It is felt that coverage of the developing world is prejudiced and ill-informed, serving to "perpetuate an inequitable global system."⁷⁸

2. *The Problem of Content Control.* An additional flaw in the implementation of the VOA model is the prevalence of content control. Most American presidents have promised editorial freedom for the VOA, but none have been able to refrain from exerting pressure on its newswriters to tone down material that might damage or embarrass the administration.⁷⁹

The existence of such pressure is almost inherent in the organizational structure of the VOA. The station is designed to carry out two often conflicting tasks. On the one hand, it must serve the government that supports it as official spokesman. On the other, it is supposed to serve the audience it reaches by supplying accurate and unbiased news reports.⁸⁰ It is clear that these conflicting roles cannot always be harmonized. John Chancellor, former director of the VOA, described the operation as "an impossible mix of people trained to serve the needs of an audience and people trained to serve the needs of a government."⁸¹

76. Giddens, *Censorship And Man's Right to Know*, VITAL SPEECHES, Feb. 15, 1977, at 280, 282.

77. See Righter, *Battle of the Bias*, FOREIGN POLICY, Spring 1979, at 121.

78. *Id.* at 122.

An extreme [view] is the Marxist thesis of Herbert Schiller . . . who holds that the international media are the principal means whereby the elites of developing societies are 'attracted, pressured, forced, and sometimes bribed' into shaping national policies that conform with the interests of capitalist economic expansion. Schiller also argues that insulation from Western cultural invasion is necessary to promote social restructuring.

Id. at 129.

79. See *infra* text accompanying notes 88-94.

80. President Kennedy aptly described this delicate complex of functions in a 1962 speech commemorating the VOA's twentieth anniversary:

It is your task, as the executives and participants in the Voice of America, to tell the story of American life around the world. This is an extremely difficult and sensitive task. On the one hand you are an arm of the Government and therefore an arm of the nation, and it is your task to bring our story around the world in a way which serves to represent democracy and the United States in its most favorable light. But on the other hand, as part of the cause of freedom, you are obliged to tell our story in a truthful way, to tell it, as Oliver Cromwell said about his portrait: "Paint us with all our blemishes and warts, all those things . . . that may not be so immediately attractive."

Roberts, *supra* note 4, at 114. See also N.Y. Times, Feb. 27, 1962, at 17, col. 2.

81. Roberts, *supra* note 4, at 109.

This organizational structure has created considerable internal strife. Consonant with its dual purposes, the VOA staff is composed of both journalists and career foreign service officers. The journalists often complain about the diplomats' lack of understanding of the journalists' function. There are complaints that the diplomats "can't break the habit of spending all their time 'trying to put a good face on things,' rather than figuring out what's happening good or bad."⁸² Conversely, it has long been felt that the objectivity of VOA journalists was affected by their diplomatic ties. VOA reporters traditionally maintained offices in embassies, travelled under diplomatic visas, and received access to classified documents. These policies were changed, however, under the regime of R. Peter Straus.⁸³ VOA reporters are now treated no differently than representatives of other U.S. media.

Although the VOA is purportedly free to exercise discretion over editorial matters, the State Department retains an oversight function. The VOA staff is supposed to follow broad policy guidelines set out by the Department, but tremendous ideological differences have often arisen between the heads of the two organizations. The effects of such intramural bickering extend far beyond Washington. Under the Nixon administration, for instance, USIA director Frank Shakespeare fought boldly for the VOA's independence, ignoring State Department guidelines.⁸⁴ Shakespeare felt that the VOA should seize every opportunity to discredit communist leaders. The State Department, meanwhile, was wading deeply in the waters of détente. This led to several embarrassing incidents. Once, while the State Department was engaged in delicate negotiations with the Soviet Union over the preservation of an Arab-Israeli cease-fire, the VOA broadcasted an editorial discussing Soviet "duplicity" in the Suez Canal area.⁸⁵ Clearly, such contradictory expressions from official spokesmen raise doubts about a government's credibility at the bargaining table.

It has been argued in some quarters that the VOA is both an objective reporter of news and an "unabashed advocate" of American views.⁸⁶ This is nothing more than self-serving rhetoric—unabashed advocacy and objectivity do not blend well. But why then is there a persistent effort to characterize VOA news reports as unbiased? Part of the difficulty is a reluctance to admit that the operation is in part an organ of propaganda. Many Americans are not comfortable with the notion that their government is disseminating propaganda during peacetime. Others, however, including high-ranking government officials, have been more candid. Former Senator Frank Church has said, for example:

It seems to me that, when we made the decision to establish the Voice of America, we made the decision to establish a government propaganda agency, the purpose of which was to transmit our message abroad The Voice of America is a government broadcasting company and to pretend otherwise is only to fool ourselves. If the Voice of America is not

82. *Id.* at 112.

83. *See id.* at 110; N.Y. Times, March 13, 1978, at 4, col. 3.

84. N.Y. Times, Oct. 25, 1970, at 3, col. 1.

85. *Id.*

86. *See, e.g.,* Giddens, *supra* note 51, at 479.

going to be the expression of the American Government, in its foreign policy and its objectives abroad, why do we maintain it?⁸⁷

Indeed, the contention that VOA is an objective reporter is belied by the persistent presence of content control. Oddly enough, those who subscribe to the fiction of the VOA's objectivity are often the most vocal advocates of government control. To be sure, some content control is not unexpected, nor even necessarily undesirable, in a government-operated station. Such a station is not expected to be totally objective; that is not its purpose. The degree of control, however, is another matter. An excessive amount of control should be avoided by democratic leaders both as a matter of principle and as a practical matter.

Every administration has, at one time or another, peered over the shoulder of the VOA newswriter.⁸⁸ Some, of course, have been more vigorous than others in wielding the blue pencil. Certainly the low point for editorial freedom came during the McCarthy era. During the Army-McCarthy Hearings in 1953, Joseph McCarthy and his Senate committee sought to ferret out communists and communist sympathizers in the Voice of America as well as in other government agencies. Under pressure from the Committee, the State Department, in early 1953, ordered that no material from works by communists "or other controversial authors" should be used *under any circumstances* in VOA broadcasts. This caused the works of certain "leftist" authors to be removed from VOA libraries.⁸⁹ Such censorship is clearly contrary to the VOA's internal guidelines which provide that information unfavorable to the United States should not be ignored in VOA broadcasts.⁹⁰ Such suppression also does little to promote the free exchange of ideas.

Admittedly the McCarthy era was characterized by extremism and paranoia, but examples from later periods are no less revealing. During its first broadcast in 1942, a VOA announcer declared, "Every day at this time, we will bring you the news. It may be good or bad, but we will tell you the truth."⁹¹ Over the years, this promise has, to a greater or lesser degree, been ignored by American leaders. During the Dominican crisis of the early 1960's, for example, VOA writers were ordered to use the term "insurgent" to describe the antidemocratic forces in that country. It was thought that this term had a more pejorative ring than either "rebel" or "revolutionary."⁹² As a further illustration, during the Watergate era, the VOA was forbidden to broadcast any stories based on "rumor, speculation, hearsay, and anonymous accusation."⁹³ This made it almost impossible for newswriters at the VOA to report the Watergate story at all. During this period, Nixon

87. N.Y. Times, May 29, 1977, at 5, col. 1. See also N.Y. Times, May 21, 1973, at 26, col. 5; *id.*, June 1, 1967, at 15, col. 1.

88. See, e.g., N.Y. Times, Aug. 26, 1975, at 13, col. 5 (Kennedy administration); N.Y. Times, June 6, 1965, at 21, col. 1 (Johnson administration); Roberts, *supra* note 4, at 110 (Nixon administration); *New Approach In Selling U.S. Image Abroad*, U.S. NEWS & WORLD REP., June 12, 1978, at 54 (Carter administration).

89. N.Y. Times, Feb. 20, 1953, at 9, col. 1. Several weeks after this order was handed down, the VOA's director of international broadcasting was suspended and reprimanded for "administrative laxity and poor judgment" when he indicated his willingness to quote some banned works in order to *attack* communist viewpoints! N.Y. Times, Feb. 26, 1953, at 13, col. 2.

90. See, e.g., N.Y. Times, June 6, 1965, at 21, col. 1; Mickelson, *supra* note 68, at 575.

91. See Giddens, *supra* note 51, at 479.

92. N.Y. Times, June 6, 1965, at 21, col. 1.

93. Roberts, *supra* note 4, at 110.

operatives contested almost everything that went on the air, particularly those pieces attempting to analyze or explain the news.⁹⁴

Another troubling confrontation arose out of a 1979 Radio Free Europe broadcast, one that occurred after the station had come under the control of the government's Board for International Broadcasting and had thus moved closer to the VOA model in its operations. RFE aired an interview with Bishop Trifa, the head of the Rumanian Church, on the occasion of that Church's fiftieth anniversary in the United States. The interview covered only one topic, the history of the Church in this country. But about this time, Trifa had been the subject of denaturalization proceedings on the charge that he was a member of Rumania's fascist Iron Guard during World War II and had thus been employed in concentration camps. Elizabeth Holtzman, then a congresswoman from New York, charged that it was "outrageous and inexcusable" for RFE to interview a man "accused by the U.S. government of fraudulent entry into this country in connection with the commission of war crimes."⁹⁵ Holtzman vowed to find out who was responsible for the broadcast and to make sure that appropriate measures were taken.

Holtzman's outburst demonstrates how the personal causes and emotions of U.S. leaders often saddle the editors at the VOA and RFE with unreasonable editorial burdens. In her blind rage, the congresswoman overlooked the fact that the interview dealt solely with the history of the Rumanian Church in the United States, a story that might inspire some hope in members of that Church living in a country without freedom of religion. It would seem logical, moreover, to go to the head of that Church for such an interview. Trifa was in no way given a platform from which he could preach Nazi ideas. Holtzman's stance also seems to take a rather casual attitude toward the principle that a man is innocent until proven guilty.

These incidents and others suggest that government control of VOA broadcasts has at times exceeded the bounds of mere prudence and bordered on excessiveness. The head of VOA's news division testified at a 1980 Senate hearing that his editors and reporters are "so completely hounded, that to present the cold, hard facts is a difficult task indeed."⁹⁶

Beyond the ideological implications, such government control may have detrimental practical effects as well. The appeal of Western broadcasts to those behind the Iron Curtain lies mainly in their supposed credibility. If government doctoring of facts causes VOA's listeners to doubt that station's credibility, then it has lost most of its persuasive force; if the listener wishes to hear propaganda, he need turn no further than the programs of his state radio. It is true that the VOA and RFE are still viewed in Eastern Europe as credible and are not thought to disseminate propaganda.⁹⁷ But American leaders would clearly be abusing this trust if they broadcast their own slanted view of world events under the guise of objectivity. And this, it appears, is what has often been done in the past.

94. *Id.*

95. N.Y. Times, May 17, 1979, at 13, col. 1.

96. N.Y. Times, May 29, 1977, at 5, col. 1.

97. See N.Y. Times, Sept. 14, 1971, at 40, col. 5.

The principles of international law do not mandate complete objectivity.⁹⁸ It has been suggested, however, that the only positive justification for communication across national frontiers is a "moral right to know."⁹⁹ But this right assumes that the access to information that is provided is an access to unbiased information.¹⁰⁰ A foreign nation, then, appears to have no moral justification for beaming distorted news to citizens of another country—its only claim to legitimacy is that of providing a check on the distortions of internal propaganda.

This is not to say, of course, that all international broadcasts must be totally objective. As suggested earlier, the attainment of such objectivity is impractical if not impossible. Any form of expression is bound to be heavily influenced by the values and environmental biases of the speaker.¹⁰¹ Most forms of speech are designed to promote some cause and exert some influence, whether directly or subtly. This is especially true of politically oriented international shortwave broadcasts. But as advocates of free speech, the VOA and RFE/RL must be admonished to practice what they preach. Advocating the cause of freedom is one thing; tampering with reality to make freedom more appealing is quite another.

IV

COSTS AND BENEFITS

The remaining question is whether the ends achieved by international broadcasts justify their cost to American taxpayers. Nearly \$100,000,000 in federal funds are expended annually to support the Voice of America, Radio Free Europe and Radio Liberty.¹⁰² Does this investment bear sufficient fruit, or would these funds be more profitably used elsewhere?

Some hard-liners actually advocate an increased expenditure so that American stations may equal or surpass the output of Radio Moscow and its satellites. It has been argued that "[s]o long as Russia uses radio to sow discord the world around, manifestly the Voice of America must be continued and sustained."¹⁰³ But this

98. The proscriptions of our domestic law, particularly the first amendment, would not seem to apply to the broadcasts of the VOA. The interests served by domestic broadcasts differ from those served by international shortwave broadcasts. In the former case, there is a desire to provide the citizens of this country with a free flow of information. In the latter, the audience is composed of foreign nationals—the protections offered by the first amendment do not extend to such persons. If there is any basis then for regulating these broadcasts, it must be an interest in preserving and promoting relations with other nations. It is axiomatic that the power of the U.S. government to conduct its foreign affairs is plenary. See Ruddy, *American Constitutional Law and Restrictions on the Content of Private International Broadcasting*, 5 INT'L L. 102, 108 (1971).

But even under a first amendment analysis, these broadcasts do not seem to present any difficulty. The government, it seems, should have as much of a right to free speech via radio as an individual citizen does. The government is not inhibiting speech by monopolizing the international airwaves. Private stations are able to and have over the years engaged in international shortwave broadcasting. See 22 U.S.C. § 1462 (1979). The dearth of such outlets is caused not by government monopolization, but rather by the fact that such stations, unlike commercial domestic stations, are not economically profitable.

99. Rowson, *supra* note 22, at 467.

100. *Id.*

101. See Rosengren, *Bias in News: Methods and Concepts*, STUD. OF BROADCASTING, March 1979, at 38.

102. Recent estimates peg the total figure at \$87,000,000. See *The Propaganda Sweepstakes*, TIME, March 9, 1981, at 15.

103. Gould, *Two Voices*, N.Y. Times, Feb. 5, 1956, § 2, at 11, col. 1.

"keeping up with the Joneses" approach is not sufficient to justify United States international broadcasting efforts. There must be some greater national good in order for the program to be sustained.

While it is true that these American stations have a large worldwide audience, this too surely cannot be enough. American citizens cannot be expected to subsidize entertainment for the world's populace. While this might be a noble and benevolent gesture, there are quite simply other needs that are more pressing. What then are the tangible benefits of an international broadcasting outlet? Clearly, the answer differs depending upon the "model" to which one subscribes. But perhaps the justifications advanced by each model have some validity.

There is much to be said in favor of creating a sympathetic understanding of our culture around the world. The United States has long labored under the "ugly American" stereotype, the conception that American society is overflowing with a wealth that breeds corruption. Under the VOA model, an international broadcast station might help to soften this image.¹⁰⁴

Although the harshness of the RFE model is undesirable, its underlying concept should not be dismissed. It may be quite profitable to express American viewpoints in societies controlled by a competing ideology. Even a limited dialogue between divergent systems seems a desirable goal. And there is some reason to believe that this dialogue may in fact be quite effective. One expert on Russian society maintains that radio is the most effective source of Western influence on the Soviet Union.¹⁰⁵ This is not surprising when some of the factors that may determine the effectiveness of particular propaganda efforts are considered. Two of these factors are the reputation of the communicator for trustworthiness, and the extent to which its message accords with the predispositions of its audience.¹⁰⁶ The United States clearly has a reputation among its listeners for honesty and objectivity. Its message, moreover, is peculiarly in accord with the dispositions of many of its listeners, especially those in Eastern Europe. The VOA's average listener in a communist-dominated country is likely to be a person who feels oppressed by his rulers and who longs for personal liberty.¹⁰⁷

Perhaps these benefits of international broadcasting can be united in a simpler underlying principle. Perhaps an official radio spokesman has become an indispensable tool of foreign policy in our electronic age. It may be true that a world power "simply cannot operate in the modern world without informing the peoples of other nations of what it is doing about matters of common international interest, and why."¹⁰⁸

But although there appear to be some tangible benefits, the argument in favor of the international broadcasters is by no means conclusive. Most of the concern with effectiveness seems to center around Eastern Europe and the Soviet Union.

104. See *How a Troubled America Puts Best Foot Forward Abroad—Interview With James Keogh, Director, United States Information Agency*, U.S. NEWS & WORLD REP., Sept. 30, 1974, at 37, 40.

105. See Ronalds, *supra* note 23, at 155.

106. See MURTY, *supra* note 64, at 63-65.

107. See, e.g., N.Y. Times, Sept. 14, 1971, at 40, col. 5.

108. Davies, *supra* note 41, at 453-54.

While it is argued that United States broadcasts have some impact there, any such impact is severely limited by a very real physical fact: the Soviet Union possesses "physical continental relevance in Europe that the United States, separated by three thousand miles of ocean, does not have."¹⁰⁹ Whatever persuasive power the voice of truth might be said to have, the rumbling of tanks in the backyards of the oppressed is an even greater persuader.

Another nagging problem is that the impact of such broadcasts is almost impossible to measure. Dissidents and refugees from target countries claim that there is a powerful effect, but their opinions are not really an effective barometer: they are inherently disposed toward Western ideas and will laud any barrage on communist rule. The effect on the average listener is imperceptible or, at best, long delayed:

The strategists may have succeeded in changing the attitudes of an external audience . . . but the change does not become perceptible until it manifests itself in overt acts. And the audience may, because of fear of deprivations that their regime might impose, refrain from overt acts that manifest the attitudes. The response sought may be long delayed, if not fully internalized by the audience. In such a case it is difficult to say whether the operations have been successful or not.¹¹⁰

The impact on listeners in lesser developed countries, for reasons which have been discussed earlier, is also open to some doubt. It has been argued that, rather than creating an understanding of American life in these countries, the result has been a deleterious parroting of incompatible ideals and values. This sometimes results in the sad paradox of an impoverished Venezuelan housewife dreaming of a frost-free refrigerator, or of a poor Mexican peasant riding a burro laden with boxes of Ritz crackers.¹¹¹

V

CONCLUSION

The ultimate effect of these efforts, then, is hard to discern. Thus, the worth of the broadcasts in dollars and cents is almost incapable of measurement. Yet, in spite of all the shortcomings and inconsistencies, the benefits do seem substantial. Furthermore, the undesirable aspects may be considerably attenuated by altering certain attitudes. To begin with, the bellicose elements of the RFE model should be finally and categorically abandoned. A positive, forward-looking approach is the more desirable and more effective method of persuasion. In addition, it must be acknowledged that these stations are undeniably in the business of persuasion. The Voice of America, no less than Radio Moscow or Radio Prague, endeavors to change the attitudes of its listeners. Acceptance of this fact will lead to a reduction in VOA hypocrisy and duplicity, and will create a better climate for effective broadcasting activity.

If American shortwave broadcasters can, therefore, come to grips with their true purpose and proceed on a positive note, rather than disparaging the opposi-

109. Powell, *supra* note 46, at 7.

110. MURTY, *supra* note 64, at 63.

111. See R. BARNET AND R. MULLER, *GLOBAL REACH* 173-76 (1974).

tion, maybe the costs of their operation can be justified regardless of how speculative the benefits. It may be that the outcome of any communication is the enlightenment of its recipient, that even propaganda may serve to convey some fairly realistic information.¹¹² And this, it has often been said, is the most basic of reasons for the existence of these stations.

112. MURTY, *supra* note 64, at 60.