

ELECTIONS AND THE MASS MEDIA*

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The purpose of this essay is to examine the role of the mass media in the electoral process: It will try to specify the character and dimensions of that role; try to outline, and sometimes to guess at, its consequences and potentialities. Because the activities of the media are so various, we can best begin this task, perhaps, just by noting and classifying the kinds of things the media do in elections.

First, the media transmit campaign propaganda to large numbers of people. In news broadcasts and news columns they report directly or in paraphrase what campaigners say. They sell campaigners time and space for advertising their wares. They make it possible for the politician to reach more people, quicker and more cheaply, than he could in any other way.

Second, the media transmit propaganda selectively. This is most apparent when media executives pare the propagandist's prodigious output to fit into the time and space they allot to reporting public affairs.¹ They also exercise discretion when they sell time and space to political groups, however; they can refuse, and have refused, to accept advertising by minor parties and even major party groups. More than anything else, it is this ability of media personnel to determine media content that makes them political actors in their own right.

Third, the media transmit propaganda in certain conventional formats. Newspapers present campaign messages in news columns, news features, advertisements, and occasionally in full transcript. Television and radio present them in fifteen and five minute newscasts; in standard time periods offered for sale; and in interviews, documentaries, panel shows, and debates. Magazines feature weekly summaries, interviews, picture stories. This matters because the formats that the mass media provide for political communication are not just different ways to present the same things. They lead politicians to say things differently and to say different things.

Fourth, the media present campaign propaganda in the context of materials they themselves originate: their opinions about who ought to win; discussions of public policy issues; reports on campaign organization and methods; personality sketches of

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¹Basing his opinion on data turned up in surveys of the content of newspapers and the broadcasting media, Robert E. Lane estimates that daily newspapers devote about 25% of their non-advertising space to public affairs subjects, and that television and radio devote a smaller proportion than that of their time to reporting public affairs. His estimate of the amount of non-advertising space in daily newspapers devoted to election news is 8%. See ROBERT E. LANE, *POLITICAL LIFE* 275-78 (1959).

the candidates; lecturettes on the duties of voters and rules of fair play for candidates; observations on who seems to be winning and why. There is a mass of such material, although it probably occupies less space and time in the media than materials originated by campaigners.² Implicit or explicit in it are a set of expectations about campaigns, notions of what is important in elections, a moral view of them, and sometimes partisan preferences.

In a narrow sense of the word "do," the activities just listed are what the media mainly do in elections and are the basis for whatever further functions they perform. A mere listing of such activities, however, gives us no hint of their impact. One way to assess that is to examine the relationship of the media to their audiences.

I

What influence have the media on voters? To ask this question is really to ask several. What attitudes are affected by the output of the various media? How strongly does it affect them? In what segments of the voting population does it affect them?

In trying to frame answers to these questions, it will be useful to distinguish between the influence the media may have in arousing interest in campaign discussion, affecting attitudes *in* elections, and affecting attitudes *toward* elections. The distinction between attitudes "in" and "toward" elections may at first glance seem unnecessary. It is an important distinction, however, because campaign discussion in the media tends to color the voter's view of the electoral process as such, not just of those contests with which it is manifestly concerned.

Why is that important? First, because elections are not just decisions—they are a way of making decisions, carrying with them an order, an ethic, and an etiquette. No one is quite certain of all the consequences that flow from this particular way of making decisions; but it is likely that it encourages in citizens a feeling of participation in governing and a readiness to accept the acts of government that lends stability to democratic regimes.³ Second, a democratic regime can derive these benefits from the electoral process only if elections are taken seriously; only if most people regard them as a good and important way to make decisions; only, that is to say, if most people adopt certain attitudes toward them.

The set of attitudes that lend support to elections as institutions is acquired. We do not expect the citizen of Ghana "naturally" to regard the winner of an electoral victory as his legitimate ruler, nor the Indian citizen naturally to regard voting as a better way to get what he wants from government than civil disobedience. We did not expect the immigrant who came to our shores to understand "our ways,"

² In their study of the 1948 election in Elmira, New York, Bernard Berelson and his associates found that stories reporting official party speeches, meetings, and statements were more frequent than stories originating from non-party sources in a ratio of about 3 to 1. See BERNARD R. BERELSON, PAUL F. LAZARSFELD & WILLIAM M. MCPHEE, *VOTING* 238 (1954). In some metropolitan papers, of course, the ratio is probably more nearly equal, and, as the authors of *Voting* note, in magazines privately originated material prevails. *Ibid.*

³ Cf. Mackenzie, *The Export of Electoral Systems*, 5 *POLITICAL STUDIES* 240, 256 (1957).

and it is doubtful that most of us understand them now, in the sense that we have examined them critically and found them good. Our own views of elections, of the significance of the vote, of proper and improper forms of political action, are a faith.

The mass media are agencies for propagating this faith. Probably they propagate it most effectively simply by devoting a great deal of attention to election activities; few can, like Macbeth, conclude that anything to which so much sound and fury attaches may signify nothing.⁴ The coverage the media give elections conveys the notion that they are important, and the media reinforce this notion with themes that run repeatedly through their accounts of campaigns and campaign events. That voters have a choice; that a decision at the polls has profound results; that politicians have their ears to the ground and care what voters think; that Soviet elections are fictitious, ours real; that citizens ought to inform themselves about candidates and issues; that denial of the right to vote is the denial of a basic civil liberty. The well educated are likely to find some of these themes tedious. They do not need to be sold on the value of elections, however, while their less well educated fellow citizens may.⁵

How many people does this media moralizing of elections affect and how strongly? The best guess would be that it encourages a more or less unquestioning faith in the significance of the electoral process, and of the citizen's role in it, among a great many people. It is, after all, an almost completely one-sided propaganda that the media are disseminating. By the same token, however, the faith may not go very deep; it may be held as dead dogma. There is some support for these observations in the results of the research that has been done on the relative effectiveness of one-sided and two-sided presentations of propaganda themes. As Joseph Klapper summarizes some of the findings of that research, "one-sidedness was more effective in converting the poorly educated . . . [and] more effective among men originally favoring the advocated view . . ." but not an efficient inoculator against subsequent exposure to counter-propaganda.⁶

Media influence on the voter's attitudes in voting has inspired more interest and more research than the impact of the media on attitudes toward the electoral process. Undoubtedly this is because the potential significance of such influence is so immediately obvious—it may determine who wins and loses. In any event, there is a more solid base for generalization here.

Early researchers expected to find the mass media a direct and potent force in shaping and changing voting behavior. Their expectations were not borne out. How a person votes and whether he votes seems most closely related to his party affiliation, his perceptions of the interests of the groups with which he identifies

⁴ Lane discusses the tendency of the media to confer status upon people, activities, and events. See LANE, *op. cit. supra* note 1, at 286.

⁵ The feeling that voting is a civic obligation appears to vary strongly and directly with level of education. See V. O. KEY, *PUBLIC OPINION AND AMERICAN DEMOCRACY* 324-25 (1961).

⁶ JOSEPH T. KLAPPER, *THE EFFECTS OF MASS COMMUNICATION* 113-14 (1960).

himself, his opinions about several long-standing issues of public policy, his perceptions of the personal qualities of candidates, and his view of party performance in the management of governmental affairs.⁷ These affiliations, opinions, perceptions, and views are relatively stable. They are not easily altered by current communications of any kind and so perforce not by communications conveyed to the voter by the mass media. Campaign communication is, in fact, more likely to reinforce than to alter them.⁸

The stability of party identifications, perceptions of group interest, and convictions about some policy issues among voters—and the high correlation of these factors with voting behavior—can be explained as follows: The voter is pressed to make a decision. He is asked, in effect, to predict the probable future behavior of rival candidates, to assess the impact of this behavior on interests he considers important, and to choose accordingly. He has only a little time to give to the matter; he is, after all, earning a living and doing other things required of him. Now, a candidate's party label, the character of the groups supporting him, and his views on a few time-worn issues are rough indicators of his probable future behavior in office. It is not surprising, therefore, that the voter seizes upon these bits of information to guide him in voting. It is an exceedingly economical, and, under the circumstances, not an irrational, way to arrive at a decision. To arrive at it in this way, however, means that the voter can and probably will remain relatively impervious to most of the communications campaigners are directing toward him.

A second reason for the failure of campaign communications radically to alter pre-existing political alignments is this: Such communications always find the voter in a context. He is tied to other people in an intricate set of relationships that serve to anchor his opinions and convictions, to mediate the impact of any communication on them. He has to fit the new ideas that come to him into a pattern of thought that his associates have come to expect of him: "Probably I will vote Democratic," a young man told one of Paul Lazarsfeld's interviewers, "because my grandfather will skin me if I don't."⁹ Group norms, group expectations, persons whose opinions are particularly valued—all these set limits on the ability of campaign discussion to induce opinion changes in the short run.

At this juncture, however, one point ought to be made clear. To say that campaign discussion in the media does not change voter behavior radically is not to say that it has no significant effect on voting. That it reinforces partisan allegiances is in itself a significant effect. That it induces marginal changes in opinions about parties, issues, and group interests is another. Finally, it is probably that the media exert a very considerable influence on the voter's perceptions of the personal qualities of candidates.

Klapper argues convincingly that the media can create opinion more easily than

⁷ ANGUS CAMPBELL ET AL., *THE AMERICAN VOTER* 67 (1960).

⁸ See PAUL F. LAZARFELD, BERNARD BERELSON & HELEN GAUDET, *THE PEOPLE'S CHOICE* 101-04 (1948). See also KLAPPER, *op. cit. supra* note 6, at 15-52.

⁹ LAZARFELD, BERELSON & GAUDET, *op. cit. supra* note 8, at 142.

they can change opinion. Why? Because to "the degree that the issue is really 'new,' the communication [about it] is unlikely to run afoul of unsympathetic predispositions, unsympathetic group norms, or unsympathetic opinion leaders."¹⁰ To put it another way, all the factors that ordinarily operate to filter and bend mass media communications to reinforce existing opinion cease to do so, since there is no existing opinion for them to reinforce.

The relevance of this observation to the politics of personality should be obvious. The personal attributes of candidates as perceived by voters influence the voting decision independently of the other factors that help to determine it; a significant number of people, in fact, seem to bring no other criterion to bear in voting than their evaluation of "the man."¹¹ The personal qualities of new candidates are, furthermore, new issues for a great many people. What newspapers and magazines say about a new candidate and the candidate's appearances on radio and television are likely, therefore, to be major factors in creating his public image—either to his damage or benefit.

In contests for nomination, the treatment the media give candidates may have even more important consequences than it does in general election campaigns. It may serve as an indication to the public of the candidacies that are to be taken seriously and those that are not. In their coverage of what candidates for nomination do and say, the media are, in Paul David's words,¹²

. . . influenced by events, by whether a candidate already holds public office, and by the ability of the candidates to create news; but wide discretion remains, along with wide opportunities for differences in perception and judgment. The cumulative effect of these judgments may well be the point at which the media have their greatest independent impact on the nomination process; certainly it is the point at which they are most directly compelled to take responsibility for decisions of important political consequence.

What the media are contributing to is a definition of the alternatives in contests for the nomination; and, in "making decisions, recognition of the alternatives for choice is always a first and vital step."¹³

Arousing interest in the electoral decision, and in discussion about it, is also a vital step in electoral decision-making. The mass media probably do as much as any institution to overcome voter apathy about campaign talk. To the extent that they succeed in doing so, they succeed because they dramatize elections, because they make them entertaining. This is conjecture, but highly plausible conjecture.

What difference does it make whether or not the voter's interest in elections is aroused? First, an interested voter, quite obviously, is likely to act differently from an uninterested one. He is more likely to expose himself to campaign discussion on his own initiative and more likely to participate politically in other ways as

¹⁰ KLAPPER, *op. cit. supra* note 6, at 61.

¹¹ Perhaps as many as 7%. See CAMPBELL ET AL., *op. cit. supra* note 7, at 240.

¹² PAUL T. DAVID, RALPH M. GOLDMAN & RICHARD C. BAIN, *THE POLITICS OF NATIONAL PARTY CONVENTIONS* 302 (1960).

¹³ *Id.* at 301.

well.¹⁴ Second, both the outcome of particular elections and the functioning of the electoral system in the long run are in large part determined by the extent to which election contests arouse the interest of voters. Voter interest is an important factor in determining the scope of electoral conflict; and, as E. E. Schattschneider has observed, "the outcome of all conflict is determined by the scope of its contagion. The number of people involved in any conflict determines what happens; every change in the number of participants, every increase or reduction in the number of participants affects the result."¹⁵

Arousing the voter's interest in elections in modern times has proved an exceedingly difficult task. If there is one thing known about the audience for campaign discussion in the mass media, it is that most of it is inconstant, inattentive, easily distracted. In campaign periods most voters expose themselves to the political output of the media to some extent.¹⁶ Few follow it closely. As newspaper readers, probably a majority of voters read little beyond the headlines.¹⁷ Most campaign speeches that are broadcast find a relatively small proportion of the potential electorate in their audiences.¹⁸ Many voters read about campaigns in magazines, but very few rate them as their most valuable source of information on campaigns.¹⁹

This kind of reaction to campaign discussion is understandable if one puts oneself in the average voter's place. For him, involvement in electoral politics is necessarily a leisure time activity. It must be paid for by foregoing some alternative use of his leisure. Why should he pay this cost? Political discussion is not of much use to him. He may indeed learn that the outcome of an election will make a difference to him, but the chance that *his* vote, informed or uninformed, will affect that outcome in any very large constituency is obviously slight.²⁰ He may derive some prestige from knowing the political score, but not in most segments of our society. He may get a sense of satisfaction from having done a civic duty, and, indeed, this does appear to be a significant factor in political participation.²¹

The media seek to capture the voter's attention for campaign discussion by appealing to his sense of civic duty. They also inculcate in him an essentially unrealistic notion of the efficacy of his vote and so, probably, succeed in getting more of his attention than they would otherwise. More important, however, they present election stories in a manner calculated to dramatize elections, emphasizing their elements of conflict, their uncertainties, the personal fortunes that ride on their

¹⁴ LAZARSFELD, BERELSON & GAUDET, *op. cit. supra* note 8, at 75-76; BERELSON, LAZARSFELD & MCPHEE, *op. cit. supra* note 2, at 246.

¹⁵ E. E. SCHATTSCHNEIDER, *THE SEMI-SOVEREIGN PEOPLE* 2 (1960).

¹⁶ For figures on audience attention to the various media during the 1952 and 1956 presidential campaigns, see KEY, *op. cit. supra* note 5, at 346.

¹⁷ For data on which this judgment is based, see *id.* at 352.

¹⁸ Probably about one-fifth. See Richard S. Salant, *The Changing Use of Television in Campaign Politics*, paper delivered at the 1961 Annual Meeting of the American Political Science Ass'n, at p. 4.

¹⁹ KEY, *op. cit. supra* note 5, at 346.

²⁰ Anthony Downs develops the implications of this argument for voting behavior in his book, *AN ECONOMIC THEORY OF DEMOCRACY* 266-67 (1957). See also Rosenberg, *Some Determinants of Political Apathy*, 18 *PUB. OPIN. Q.* 349, 354-61 (1954-55).

²¹ See ANGUS CAMPBELL, GERALD GURIN & WARREN E. MILLER, *THE VOTER DECIDES* 195-96 (1954).

outcomes. The language of campaign reporting—"infighting," "counter-attack," "the next move," "homestretch"—is the language of sports, games, and military action. Stories about the early lives of candidates, about how their wives feel about the coming decision at the polls, about the tensions and frustrations of campaigning—these are for the most part irrelevant to anything but the presentation of elections as drama. Reporters and broadcasters present campaigns in this way, undoubtedly, simply because they do not want to carry dull stories or broadcast dull programs. If one were to try deliberately to conceive of a strategy that would arouse the voter's interest in campaign discussion, however, it would be difficult to conceive of a strategy more effective than that which the media have unconsciously adopted. To dramatize politics is to make paying attention to campaign discussion its own reward.

The public reaction to the television debates in the 1960 presidential race suggests that the power of campaign discussion may not only depend in large measure on its value as entertainment, but may vary radically when that value varies. Unlike most political shows, the debates were exceedingly well designed to exploit the drama inherent in a presidential election. They brought the two candidates face to face in an atmosphere of uncertainty, tension, and deadly seriousness. Whatever the outcome might mean for the voter, he could see and feel what it must mean for John F. Kennedy and Richard M. Nixon.

By any applicable standard each of the debates drew an enormous audience: bigger than that for the Sunday World Series game, bigger than that for the most popular regularly scheduled commercial show, bigger than that reached by either of the two national conventions in any given time period, far bigger than that attracted by any paid political telecast.²² They held their audiences more effectively than hour-long commercial entertainment shows and far more effectively than programs like *CBS Reports*.²³ The average paid political broadcast in 1960 attracted seventy per cent of the audience normally attracted by the show it replaced. The debates, on the average, attracted 120 per cent of the audiences of the programs they replaced.²⁴ In the 1956 campaign the number of persons expressing "very much interest" in the campaign rose from forty-six per cent in September to forty-seven per cent in October, an increase of one per cent. During the same period in 1960—the period of the debates—there was a twelve per cent increase in the number of persons expressing "very much interest" in the campaign.²⁵

If the argument that has just been made—that interest in politics varies strongly with the entertainment value of politics and that the media arouse interest in elections by exploiting their value as entertainment—if this argument is valid, then it also follows that the media have helped to create the normal disinterest in political discussion that they help to overcome. In the entertainment-starved small towns of

²² Kelley, *The 1960 Presidential Election*, in *AMERICAN GOVERNMENT ANNUAL* 66-67 (1961).

²³ Testimony of Frank Stanton, in *Hearings Before the Communications Subcommittee of the Senate Committee on Interstate and Foreign Commerce on Review of Section 315 of the Communications Act*, 87th Cong., 1st Sess. 46 (1961).

²⁴ *Id.* at 38.

²⁵ *Id.* at 39.

the nineteenth century, politics seems to have been an inviting leisure time activity. Ostrogorski reported that,²⁶

The whole neighbourhood is invited to a "rally," a big meeting; the farmers generally come in large numbers, on horseback, in breaks, or on foot, often with their families. Political speakers sent down by committees hold forth in a covered enclosure to audiences which, especially in the West, are composed of both men and women. In the daytime a "procession" takes place: the faithful followers of the party, adorned with emblems, scour the country, headed by a band; the negro village barber, wearing a costume trimmed with gold, beats time with indescribable dignity. In the evening the houses of all the party faithful are illuminated and a torch-light procession concludes the "Chinese business." The fête, however, still goes on; the speakers reappear, and, in the open air, on the green, by the flickering glare of the torches, they harangue the assembled crowd. But the attention of the wearied public is distracted, there are only a few groups listening here and there, the rest are talking, the young people are flirting in the dim light.

What Ostrogorski was describing, of course, was a social and recreational, as well as a political occasion. Since his day, the mass media have made entertainment widely available and cheaply available, and the kind of occasion he reports has all but disappeared. Politics as a form of entertainment, it would seem, has suffered badly from the rising competition of other forms of entertainment.²⁷

II

The role of the mass media in the electoral process is not defined solely by the impact of media activities on the attitudes of voters. The media also do things both for and to politicians, and to modes of political action, organization, and discourse.

The modern candidate is acutely interested in gaining access to the media and in using that access effectively. He spends a large proportion of his campaign funds for the purchase of broadcast time.²⁸ He adjusts the output of his statements to the rhythms of newspaper production. Even his whistle-stopping, and now his jet-stopping, is intended as much to capture the front pages of local newspapers as it is to expose the candidate to local crowds.

In view of what has been said about the relatively modest capabilities of campaign communication to change votes, all this concern with the media might seem misguided. Of course it is not. To win office in a competitive two-party system the campaigner normally must make marginal changes, but need not make more than marginal changes, in the political situation in which he finds himself. And that is what the realistic campaigner will try to do. He will try to increase the enthusiasm of his supporters in an effort to increase somewhat the numbers of them that go to the polls. He will try to give a somewhat wider currency to his name and project

²⁶ M. OSTROGORSKI, *DEMOCRACY AND THE PARTY SYSTEM IN THE UNITED STATES* 200 (1926).

²⁷ My colleague, Professor Marion J. Levy, Jr., has long been interested in the relation of politics to entertainment. He nicely characterizes the politician's abandonment of the harangue for a chance to appear with Jack Paar or Ginger Rogers as a change from "politics as entertainment" to "entertainment as politics."

²⁸ ALEXANDER HEARD, *THE COSTS OF DEMOCRACY* 389 (1960).

a more attractive image among independents, the undecided, and the uninterested. He will take stands on issues designed both to increase his appeal to the main body of his supporters and to "swing" groups in the population.

In realizing these objectives the sheer size of the audience he can reach is important to him, for the larger the audience he reaches, the more likely it is to include the most malleable elements of the population. Television and newspapers—the mass media *par excellence*—enable him to reach maximum audiences more cheaply than he could by any alternative means. In 1960 Vice President Nixon was seen in person by an estimated ten million people.²⁹ In 1952 party workers solicited the votes of perhaps fifteen million people.³⁰ Both these figures are less than the normal audience for one paid political telecast in a presidential campaign. Presumably candidates could reach as many voters by direct mail as they can *via* newspapers and television, but the cost per voter reached would be far higher.

The communications that the campaigner aims at the general public through the mass media are important not only for their direct effects, but also because they reinforce and support other campaign activities. The candidate may reach an understanding with farm leaders or business leaders; what farm magazines or business magazines say about the candidate help to translate such understandings into votes. He may reach an agreement with the leader of an opposing faction within his party—as President Eisenhower did in his Morningside Heights meeting with the late Senator Robert A. Taft—and the media will carry news of the agreement to the party rank and file. He may use the mass media to facilitate the efforts of party workers to get voters registered and to the polls, just as the commercial advertiser facilitates over-the-counter sales of his product by advertising in the media. The very fact of his ability to mount a campaign of impressive proportions in the media may contribute greatly to maintaining the morale of his campaign workers.

These are some of the things the mass media can do *for* politicians. As has already been noted, however, they also do things *to* politicians and to politics. The nature of these influences can be made clearer if we contrast the properties of the media with the properties of the political communications systems that ante-dated their rise. Probably the most important of these was the political machine, and the contrast can be made the clearer because the rise of the mass media has been accompanied by the machine's gradual decay.

Both the machine and the mass media can enable the politician to establish a relationship with voters and to give a partisan direction to their opinions and actions. They perform these functions, however, in quite different ways. The machine's precinct workers sought direct, personal ties with the voter. They performed services and expected loyalty in return: Elections are won, Chicago's Jacob Arvey has observed, "by what you do all year round, by the day-to-day good will you generate in each precinct."³¹ However true this may once have been (and may still be in some

²⁹ Salant, *supra* note 18, at 4.

³⁰ CAMPBELL, GURIN & MILLER, *op. cit. supra* note 21, at 33.

³¹ Arvey, *Ward Politics*, in JAMES M. CANNON (ED.), *POLITICS U.S.A.* 97 (1960).

localities), the media do not lend themselves to this kind of political action—one cannot fix parking tickets, keep a boy out of jail, or deliver food to the needy *via* newspapers and television. The mass media are useful to the politician as instruments of propaganda. The decline of the machine and the increasing dependence of politicians on the media, therefore, has meant a gradual shift in American political life from the politics of personal favors toward a politics of issues and images.

These same two events have tended to give candidates a greater voice in the affairs of the modern political organization and sometimes to make them its effective leaders. The test of the classic machine's power as an organization was its ability to deliver votes regardless of candidates and regardless of issues. To quote Arvey once more:³²

We won. In a ward where 90 per cent of the voters were Jewish, we beat the Jewish candidate, who was not only a very popular man but a very able governor. I don't think my father could have been any closer to me than Henry Horner was; but we beat him $2\frac{1}{2}$ to 1.

The big majority that voted for Bundesen were not enthusiastic about Bundesen. They liked him all right; but they were voting for the prestige of the organization. And we, through our precinct captains, had made them conscious of why they should support the organization. To me, that's ward politics.

But it is not mass media politics. An attractive candidate is among the most salable commodities available to a political organization that must use the media as its primary means to reach the electorate. The proven vote-getter, therefore—a Thomas E. Dewey, a Robert F. Meyner, a Joseph Clark—becomes, if not the leader of the organization, at least one of its stars. And he must be treated as such.

New weapons systems bring new kinds of military specialists to the fore. The battleship admiral gives way to the carrier admiral, the airplane general to the missile-man. New political communications systems act in a similar fashion. The rise of the mass media has altered the personnel of political organizations to include, and to give greater weight to the opinions of, those skilled in their use and in the politics of issues and images that their use entails. Among those with the required skills are the public relations man, the advertising man, the academic brain-truster, the editor, and the publisher.

Editors and publishers are not newcomers to the inner councils of political organizations, although their presence there undoubtedly has a different significance now than it did when the political machine was at the height of its power. Nor do all editors and publishers become actively involved in their parties' affairs. Those who wish to become involved, however, have three strong claims to the practical politician's attention: Their knowledge of the media and their use, the power of their editorial columns, and their power to give a partisan bias to the news. Probably a relatively small proportion of the nation's publishers exercise this last power in any flagrant manner—at least so one would conclude from one of the best recent studies

³² *Id.* at 103.

of press campaign coverage.³³ But all bias need not be flagrant: Newspapers and news magazines can devote comparable space to what campaigners are saying while emphasizing or de-emphasizing themes in their propaganda. They can, by carefully chosen words, subtly suggest the heroes and villains of the events they are reporting. The best judgment would seem to be that if most of the press uses its power to bias with moderation, it nevertheless uses it; that if it is a limited power, it is nonetheless real.

In arguing that the modern campaigner plays a politics of issues and of personality appeals, we have not, of course, meant to imply that issues and personality appeals assumed importance in politics only with the rise of the mass media. The argument is rather that they are of greater importance now than they were previously. Does the modern politician also treat issues differently than his pre-mass media counterpart? The answer would seem to be: In some respects, yes; in some important respects, no.

The mass media form a network of communication that transmits messages almost instantaneously to national audiences. The fact has at least two important consequences. First of all, it forces the politician to maintain consistency in his appeals; he cannot profitably pander to local prejudices by saying one thing in one place, another in another. Indeed, it has become a fashion for presidential candidates to make their first statements on civil rights questions in the South, to repeat them later (with suitable notice of their original source) to Negro audiences in the North. Second, the modern politician is compelled to give his campaign a pace, an appearance of movement. Before the rise of the mass media the campaign speaker could develop—just as the Chautauqua speaker developed—an act in which he could use repeatedly all his most successful rhetorical embellishments. The modern campaigner still uses a basic speech which he repeats with variations, but he must search day after day for new pegs to hang it on, if he is to furnish newsmen with new headlines and voters with new topics of conversation. Vice President Nixon, whose basic speech became so well known to newsmen that many could repeat it almost verbatim, nevertheless managed to vary it by promising, on three successive days in late October 1960, a manned flight around the moon in 1966-69, a possible summit talk with Premier Nikita Khrushchev, and a tour of the Eastern European captive nations.

As has already been noted, the formats that the media provide for political expression not only serve as its vehicles, but also discipline it. A campaigner must make a series of decisions as to the way he will handle issues. He must decide what issues to stress, which (if possible) to avoid; with what degree of specificity to state his positions; how much attention to give to his opponent; how to portray his opponent's record and positions on policy problems. The form in which he expects his communications to reach the public will be an important factor in determining the nature of these decisions.

³³ See NATHAN B. BLUMBERG, *ONE-PARTY PRESS?* (1954).

Propaganda designed to capture the headlines or to reach the public through spot announcements, for instance, is normally characterized by gross distortions and a failure to define party differences. It is so characterized because the propagandist works on the assumption that communications distributed in this manner will reach many voters whose attention is so sporadically attracted to campaign discussion that they are unlikely to hear the answers of one side to the assertions of the other. It is good strategy, therefore, for propagandists on both sides to present their opponent's position in as poor a light as possible and to ignore attacks on their own weaknesses. With a debate, however, good propaganda strategy becomes quite a different thing. Both sides have equal and simultaneous access to the same audience, an audience that includes the partisans of both and of neither. In this situation to distort the position of one's opponent is to invite a quick and authoritative reply. To fail to answer challenges is to invite a conclusion by the audience that a good answer is not possible. To fail to define differences with one's opponent is to invite him to define them in the way most advantageous to himself. Debates thus tend to increase the accuracy, specificity, and relevance to the voting decision of statements in campaign discussion.³⁴

The media sometimes put campaign discussion into a question-and-answer format by means of press conferences, panel shows, interviews, and other devices. This format, too, affects the character of campaign discussion. It tends to force candidates to take responsibility for arguments made on their behalf or to disavow such arguments. It was in a press conference that President Eisenhower declined to endorse the notion that the Democratic Party had been the party of wars, a notion that the Republican National Committee had been seeking to cultivate. The question-and-answer format forces candidates to discuss issues they most probably would prefer to avoid, as when the *Farm Journal* solicited and got President Kennedy's reply to the following inquiry, "You announced in Los Angeles at the Democratic Convention that you would introduce emergency farm legislation in August. Since there was a large Democratic majority in both Houses to support such action, why didn't you introduce the legislation as promised?"³⁵ If editors, reporters, and panelists make their questions specific, they tend to get specific answers to them; one can evade a direct question, but only at the cost of appearing to be evasive.

Once these sorts of media influence on political discourse have been acknowledged, however, it remains true that the revolution in communication has not been accompanied by any comparable revolution in the way campaigners treat issues. James Bryce's description of campaign discussion applies in its essentials equally well to such discussion both before and after the rise of the mass media:³⁶

The object of each party naturally is to put forward as many good political issues as it can, claiming for itself the merit of having always been on the popular side. Any one

³⁴ The author has developed this argument much more fully in *POLITICAL CAMPAIGNING* 18-20, 67-69, 154 (1960).

³⁵ *Here's Where the Candidates Stand*, *Farm Journal*, Oct. 1960, p. 37.

³⁶ 2 JAMES BRYCE, *THE AMERICAN COMMONWEALTH* 208 (1890).

who should read the campaign literature of the Republicans would fancy that they were opposed to the Democrats on many important points. When he took up the Democratic speeches and pamphlets he would be again struck by the serious divergences between the parties, which however would seem to arise, not on the points raised by the Republicans, but on other points which the Republicans had not referred to. In other words, the aim of each party is to force on its antagonist certain issues which the antagonist rarely accepts, so that although there is a vast deal of discussion and declamation on political topics, there are few on which either party directly traverses the doctrines of the other. Each pummels, not his true enemy, but a stuffed figure set up to represent the enemy.

Today, as in Bryce's day, the campaign discussion that the media convey to their audiences is, in very large measure, a discussion where the candidates talk past each other, one that is filled with distortions, ambiguities, and meaningless generalities.³⁷

Why? Among other reasons, because the potentialities of the media for altering the quality of campaign discussion have just begun to be explored.

III

Before the 1960 election, spokesmen for the broadcasting networks, particularly those for the Columbia Broadcasting System, argued that television's capacities for presenting campaign discussion in its most instructive forms remained largely unexploited. They were arguing to a point. They wanted revision or repeal of section 315 of the Federal Communications Act. Their fight for relief from section 315, however, pushed them toward explicit statements of what they thought elections were for and what they saw as their own obligations in the electoral process. The result was a dialogue between congressmen and broadcasters with important policy implications for all the media, not just television.

In effect, section 315 answered two related questions. Have candidates any claims to access to mass media facilities? Section 315 recognized none as such. What should determine the access of candidates to the media? Section 315's implicit answer was: Ability to pay and the inclinations of media executives. This answer was qualified in one particular. If *broadcasters* gave a candidate time, they were to make comparable free time available to all his legally qualified opponents. If they sold a candidate time, they were to stand ready to sell comparable time to all his legally qualified opponents.

In their fight to revise or repeal this act, the broadcasters sought the same freedom to carry, or not to carry, campaign discussion that newspapers and magazines enjoy. They were therefore hostile to any legal requirement that they give candidates access to their facilities.³⁸ Nevertheless, they not only admitted but asserted

³⁷ BERELSON, LAZARSFIELD & MCPHEE, *op. cit. supra* note 2, at 236; LANE, *op. cit. supra* note 1, at 278.

³⁸ Such as that proposed, for instance, in S. 3171, 86th Congress. They opposed legally required gifts of free time to candidates also on the grounds that such action would violate the first amendment and would constitute a taking of private property without just compensation. See testimony in *Hearings Before the Communications Subcommittee of the Senate Committee on Interstate and Foreign Commerce on S. 3171, Presidential Campaign Broadcasting Act*, 86th Cong., 2d Sess. 227, 229, 235, 236-45 (1960) [hereinafter cited as *Hearings on S. 3171*].

their moral obligation to further several objectives. They agreed, first of all, that campaign communications should be widely distributed and that free time for candidates was desirable as a means to that end. In their eyes one of the greatest defects of section 315 was that it made gifts of time prohibitively expensive, thus discouraging such gifts almost completely. It did so because it made no distinction between candidates of major and minor parties.³⁹ Second, they urged that for major party candidates equality of *access* to the media was an insufficiently ambitious goal. The payoff in politics comes not in speaking but in being heard. The media should try, therefore, to afford maximum *audiences* for campaign discussion.⁴⁰ Finally, CBS President Frank Stanton asserted the right, if not the duty, of broadcasters to take a hand in shaping the character of campaign discussion. He sharply criticized an overemphasis in campaigning on "showmanship, canned rhetoric, sloganeering and . . . presenting the candidate as though he were a product." The broadcaster, he said, should encourage "sharpening the great issues of the day through encouraging debates and discussions among the candidates."⁴¹

On the occasion when Stanton expressed this last view, Senator John Pastore was startled, perhaps by what he regarded as its arrogance. A part of the Stanton-Pastore exchange is worth quoting.⁴² To Stanton's statement that "canned presentations" were not the best way to inform the electorate, Pastore responded, "Why?"

Mr. STANTON. Why?

Senator PASTORE. Yes, sir; why? Do you think just a few reporters might ask embarrassing questions that might have a cataclysmic effect at the moment or they get into some phases they think would be of interest to them? I think you are belittling the intelligence of a man who rises to that high position [of President]. You don't mean to tell me that he is going to give the U.S. public a lot of corn and then be elected President of the United States? I think that is an insult to the intelligence of the American people You say to me that if you leave it to the stations themselves to search out the questions, they know better than the candidate knows himself what the American public wants to know. That is in essence what you are saying, that apparently the truth isn't going to come out unless you go it your way.

Tactfully, Stanton denied that he was "in essence" saying any such thing. His position as revealed in his testimony, however, can fairly be stated as this: If the electorate

³⁹ Richard S. Salant, President of CBS News, put the industry's argument on this point in these terms: "How many . . . have heard of Homer A. Tomlinson or Fred C. Proehl or Don DuMont or Edward Longstreet Bodin or Ellen Linea W. Jensen? Each of these was a duly nominated candidate for President in 1952. . . . No matter how obscure many of these parties may be, section 315 requires us to regard them on an equal footing with the Democratic and Republican parties. We cannot, therefore, consider giving a half hour free to the Republican and Democratic candidates without taking into account the 16 more half hours which under the law we would be required to give to the other 16 parties at their request. . . . As a matter of simple common sense, in the interests of our own self preservation as well as the protection of our listeners . . . once the campaign actually begins, we cannot give time free to candidates; we must sell it at regular rates." See his testimony in *Hearings Before the Senate Committee on Rules and Administration on Federal Elections Act of 1955*, 84th Cong., 1st Sess. 175-76 (1955).

⁴⁰ See the exchange between Frank Stanton, President of the Columbia Broadcasting System, and Senator Gale W. McGee on this point in *Hearings on S. 3171*, at 187.

⁴¹ *Id.* at 182.

⁴² *Id.* at 183.

is to be informed, broadcasters should try to carry campaign discussion to as many voters as they can. If the electorate is to be well informed, broadcasters should be concerned about the quality of the discussion they carry. What they do, or do not do, helps to determine that quality. It is incumbent on them, therefore, to try to impose on candidates program formats that will yield discussion of a higher quality than candidates, left to their own devices, would provide. In Stanton's view, debates were such a format.

In 1959 and in the 1960 post-convention session of Congress, the television industry got about what it had been after. Congress revised section 315 to enable broadcasting license holders to feature appearances by a candidate—without incurring any legal obligation to provide equal time to his opponent—in bona fide newscasts, news documentary shows, and news interview programs. Moreover, the application of section 315 to presidential and vice presidential candidates was suspended altogether for the duration of the campaign.⁴³

How did television use its new freedom? The industry's most spectacular contribution to the campaign was, of course, its presentation of the four Nixon-Kennedy joint appearances. But it also led the two candidates down other paths previously untrodden by presidential contenders on campaign. Both appeared on NBC's "Meet the Press" and Kennedy appeared on CBS's "Face the Nation." Both were interviewed at great length—on "Person to Person," "Tonight," "Presidential Countdown," and "The Campaign and the Candidates." Both had a number of their more important appearances featured *via* tapes in documentary treatments of the campaign. Vice Presidential candidates Lyndon Johnson and Henry Cabot Lodge, Jr., appeared on many of these same programs.

These innovations in television's campaign coverage did not escape criticism. One editor termed the debates "electronically contrived bad dreams"⁴⁴ and a leading historian ventured the opinion that George Washington "it is safe to say, would not have come out very well"⁴⁵ in a television debate. The superficiality of the questions posed by members of the debate panels drew complaints, as did the necessity for the candidates to give snap answers to their questioners. The severest critics contrasted the Nixon and Kennedy performances unfavorably with what they felt was really needed—a long, deep, serious, "thorough and concentrated consideration of the great issues that face our generation,"⁴⁶ a consideration in which the candidates could have engaged in "the slow questioning of alternatives before decision"⁴⁷ or have lapsed into "thoughtful silence."⁴⁸ While the other industry-sponsored programs aroused less comment than the debates, there were those who found distasteful

⁴³ 73 Stat. 557 (1959), 47 U.S.C.A. § 315 (Supp. 1962); Act of Aug. 24, 1960, 74 Stat. 554.

⁴⁴ Ascoli, *Intermezzo*, *The Reporter*, Nov. 10, 1960, p. 18.

⁴⁵ Commager, *Washington Would Have Lost a TV Debate*, *N.Y. Times*, Oct. 30, 1960 (Magazine), p. 13. One wonders if "it is safe to say" this because it is so obviously true or because it is so obviously impossible to demonstrate its falsity (or truth).

⁴⁶ *Id.* at 80.

⁴⁷ THEODORE H. WHITE, *THE MAKING OF A PRESIDENT*, 1960, at 292 (1961).

⁴⁸ *Ibid.*

the mixture of politics and gags that attended the candidates' appearances on comedian Jack Paar's show.

The majority reaction to television's innovations in campaign discussion, however, was clear. They had been good additions to campaigning, particularly the debates. I concur in the majority opinion.

A good deal of the criticism of the debates seems to have been based on a thoroughgoing misunderstanding of what campaigning is all about. Candidates are not university lecturers. They are not disinterested analysts of public affairs. They are seekers after public office, pleaders in their own cause. Before seeking public office they *ought* to have given previous thought to issues like aid to education, foreign aid, medical care for the aged, inflation, and farm surpluses. They ought to be able to say what they think should be done about such issues. They must at least seem to have thought about them.

Many of the critics, moreover, seem not to have compared what Nixon and Kennedy said in the debates and what they said (or was said on their behalf) in speeches, spot announcements, five-minute trailers, leaflets, pamphlets, and billboards. In their joint appearances Kennedy and Nixon frequently acknowledged agreement, rarely attributed false positions to each other, exposed quite clearly their differences on a number of significant issues, challenged each other and responded to each other's challenges. This kind of behavior is not typical of campaigners and it was not typical of Nixon and Kennedy when they made their appeals for public support in other ways.

Finally, the critics ignored one of the most striking achievements of the debates. They gave both candidates an equal opportunity to present reasonably comprehensive statements of their respective cases to what was substantially the total potential electorate. They were an answer to one of the principal problems associated with our present system for financing campaigns—inequalities in the abilities of parties and candidates to raise money. Such inequalities have never been a danger because they enabled the well-financed candidate to reach too many people with his views. They have been a danger because his poorly-financed opponent was able to reach too few. The debates equalized the opportunities of the two presidential candidates to communicate far more effectively than we have ever been able to by putting restrictions on contributions and expenditures.

Whether broadcasters should be encouraged to arrange debates between candidates in the future is a live policy issue. Unless Congress again suspends, or revises, section 315, network sponsorship of such debates would once more give all minor party candidates legally valid grounds for claims to equal time. Two bills have been introduced in the present Congress that are designed to permit a repetition of the 1960 experiment. One, sponsored by Senator Warren G. Magnuson, would make the provisions of section 315 permanently inapplicable to candidates for President and Vice President.⁴⁹ The other, sponsored by Senator

⁴⁹ S. 204, 87th Cong., 1st Sess. (1961).

John Pastore, would make them inapplicable to candidates for the offices of President, Vice President, United States Senator, United States Representative, and Governor.⁵⁰

Probably either measure would be acceptable to broadcasters. Passage of either would be preferable to congressional inaction.

Some questions should be raised about the two bills, however, and about the 1960 exemption of news documentary and news interview programs from section 315's equal time provisions as well. This last increased the power of broadcasters to determine the amount and kind of access to broadcasting facilities that candidates would receive. The Magnuson and Pastore bills, particularly the Pastore bill, would increase it still further. Might not Congress usefully limit the discretion of broadcasters? To be sure, they behaved fairly and responsibly in 1960. Can we be confident that they will continue to do so? That they will do so in campaigns for nomination as well as in general election campaigns? That local station managers, covering state-wide and district-wide campaigns, will display the same kind of fairness and responsibility that network executives have shown? Should not some provision be made for giving the candidates of minor parties a claim on free time? Do they not have a contribution to make to campaign discussion, potentially at least, that is not an exact function of the numbers of their followers?

These are not rhetorical questions, but they are not trivial either. Congress could meet the broadcasting industry's principal objections to section 315 in its pre-1960⁵¹ form by writing into it a distinction between "leading" and "minor" candidates for nomination and "major" and "minor" party candidacies in general elections. The law could then require substantially equal treatment as among candidates falling into the same categories, while establishing some permissible degree of inequality as between candidates falling into different categories. Terms like "leading" candidate and "major" party do not, of course, define themselves. Charles A. H. Thomson, however, has suggested sensible definitions for them that would raise no insuperable problems of administration.⁵² Such a change in section 315 would bar none of the things broadcasters did in 1960; it would be a check on partisan favoritism in grants of free time.

The industry could object that section 315, even if revised along these lines, would still deny to it the kind of journalistic freedom that newspapers and magazines enjoy. It would, and it is easy to sympathize with the objection. All the media, the broadcaster can argue, ought to be interested in exposing maximum audiences to the arguments of opposing candidates; in encouraging candidates to acknowledge their points of agreement and to clarify their differences; in discouraging falsehood, distortion, and vacuous ambiguity in campaign discussion. The broadcaster has done at least as much as most of his colleagues in the press to serve these objectives

⁵⁰ S. 2035, 87th Cong., 1st Sess. (1961).

⁵¹ Except those bearing on the application of section 315 to newscasts.

⁵² See CHARLES A. H. THOMSON, *TELEVISION AND PRESIDENTIAL POLITICS* 129-33 (1956).

and a good deal more than some. Yet the printed media (subject to the laws of libel and obscenity) are free to treat campaign discussion in any way they see fit. He is not.

There are at least two morals that can be drawn from this argument, however: that broadcasters ought to be allowed, in Stanton's phrase, "to put on long pants," or that some checks on abuses of journalistic discretion by editors and publishers ought to be imposed.

The right of reply law is one possible check on partisan favoritism in the press that deserves serious consideration. Such laws, originally a French invention, allow a person dissatisfied with a newspaper or magazine account of his activities to claim equal space for a reply. A Nevada statute, for instance, grants the right to reply to anyone "named or otherwise designated in such a manner as to be identified."⁵³ A person claiming the right must do so within one week of the publication of the objectionable story, if it is carried in a daily newspaper, or within thirty days, if it is carried by a weekly newspaper or by a periodical. The publisher must then carry the reply within a specified time after receiving it, giving it "a like position and space and as much display as the statement which provoked it."⁵⁴ He must publish it without charge unless the reply is longer than the original story.

Editors are apt to fear that passage of such a law would flood them with trivial or unwarranted claims on their space. The right to reply has not been overused in Nevada, however; and it is unlikely that it would be overused elsewhere, particularly if limited in application to candidates for public office. No politically realistic candidate would insist on the right to reply unless he had received flagrantly unfair treatment in a newspaper or magazine consistently hostile to him. To do otherwise would be to risk the ire of friendly or neutral editors, whose normal editorial practices will give him a better chance to publicize his cause than the right of reply ever could.

But, of course, there are some newspapers and magazines that do indulge in one-sided and flagrantly unfair treatment of candidates in their coverage of campaigns. Some editors use their space, or allow it to be used, to cast aspersions on a candidate's reputation, to falsify or distort his record, to quote him out of context, or to put his actions in a false light. The right of reply would give candidates speedy recourse in such cases and a remedy more relevant to their political interests than a libel action could afford. More important, it would give readers of such newspapers and magazines a greater opportunity to hear what is to be said on both sides in such controversies. It would do so more often, probably, because editors would adopt policies designed to forestall exercise of the right than because the right itself would be frequently invoked.⁵⁵

When all this has been said, however, two points should be made. First, legisla-

⁵³ NEV. COMP. LAWS § 10506 (1929).

⁵⁴ *Ibid.*

⁵⁵ For further discussion of right of reply laws, see Donnelly, *The Right of Reply: An Alternative to an Action for Libel*, 34 VA. L. REV. 867 (1948), and 1 ZECHARIAH CHAFEE, JR., *GOVERNMENT AND MASS COMMUNICATIONS* 145-95 (1947).

tion may be a help in curbing press bias, but it cannot create good journalism. Only good journalists can do that. Second, bias is not the only shortcoming in press coverage of campaigns.

Just as important a shortcoming, if not more important, has been the willingness of all but a few newspapers and magazines simply to reflect campaign discussion as it has been shaped by campaigners, letting them set its tone, its style, its manner. Genuine debate in campaigns need not have waited on television. Newspapers and magazines could long ago have done a great deal "to persuade and bully the rival candidates into acknowledging each other's existence" and to force them into "accord-ing each other's arguments the dignity of an occasional reply."⁵⁶ But few have tried to do so; certainly the press in the collective sense of that word has not.

Newspapers could help to improve the quality of campaign discussion if they would insist that the press conference be treated as a campaign institution. At the present time many candidates all but suspend press conferences for the duration of their campaigns. They like to reserve to themselves choice of the things they will talk about and when and where they will talk about them. They do not want to be asked to comment on an opponent's attack, to take responsibility for the statements of their supporters, to reconcile statements they have made at one time with those they have made at another, to specify what they would prefer to leave vague. Getting candidates to meet with reporters in regularly scheduled press conferences, therefore, is not an easy matter. A unified effort by newspapers to explain the value of press questioning of candidates, however, and to publicize the willingness or unwillingness of candidates to submit to questioning, could be an effective means for overcoming their reluctance to do so.

Further, the press need not and ought not to permit broadcasters a monopoly in promoting debates between candidates. A few papers in the past have carried "battlepages," where opposing candidates (or spokesmen for them) have presented their arguments in side-by-side columns. These can be highly popular features, particularly if the statements are carried under the candidates' bylines, if candidates address themselves to the same topics at the same time, and if provision is made for them to comment on each other's contributions. In presidential campaigns, an industry-sponsored, syndicated battlepage available for distribution to all newspapers could be the press equivalent of the television joint appearances. Cooperative efforts at state and local levels could produce a similar feature in campaigns for other offices. The press has often argued that issues can be treated more subtly, at greater length, and with greater flexibility in print than they can in sight and sound. It has a chance to prove it.

Finally, the press could do much to discourage falsehood and distortion in campaign discussion. It could do so by including in its news stories more materials helpful to readers in assessing the accuracy and significance of the things campaigners

⁵⁶ Nicholas, *The Long Morning After, V: Afterthoughts from Abroad*, *The Reporter*, May 17, 1953, p. 36.

say. If the leaders of an organization announcing itself as a movement of independents are known to be party regulars, the fact should be noted. If a candidate misquotes his opponent, the opponent's actual statement should be bracketed in. If a statement is a half-truth, the reporter should supply what he believes to be the other half.

Such practices are sometimes decried as departures from the canons of objectivity, objectivity being interpreted as meaning the poker-faced presentation as "news" of anything a public figure says, without background, without interpretation, without any attempt to point out that facts are missing. Richard Rovere has implied that reporters had no way to convey to their public "the true gamey flavor" of some of the late Senator Joseph McCarthy's early performances, or the fact that they were "so disorderly, so jumbled and cluttered and loose-ended. . . ."⁵⁷ Why not? Why could they not have said they were disorderly and jumbled?⁵⁸ Rovere has even argued that McCarthy's naming of Dorothy Kenyon as a card-carrying Communist employed by the State Department was news, while the fact that Dorothy Kenyon had never been employed by the State Department was not.⁵⁹ Again, one can only ask, why not? Or, to put the question as *New York Times* editor Wallace Carroll has phrased it, when "a reporter has solid evidence that a statement is misleading, should he merely report the statement or should he give the reader the benefit of his additional knowledge?"⁶⁰ The issue is not, as Rovere seems to believe, one of the reporter telling his readers what facts are really facts *versus* permitting the reader to reach his own conclusions. It is one of giving the reader a greater *versus* a lesser number of putative facts on which to base his judgment.

⁵⁷ RICHARD H. ROVERE, *SENATOR JOE MCCARTHY* 137 (1960).

⁵⁸ Some reporters said just that regarding General Edwin Walker's recent testimony before a Subcommittee of the Senate Armed Services Committee.

⁵⁹ ROVERE, *op. cit. supra* note 57, at 167.

⁶⁰ Carroll, *The Seven Deadly Virtues*, *Michigan Alumnus Quarterly Rev.*, Aug. 6, 1955, p. 332.