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A panel headed by Dr. Frank Stanton has offered proposals to reorganize U.S. information, cultural, and broadcasting operations in the field of public diplomacy. One of the panel's proposals to reassign to the State Department the United States Information Agency's (USIA) role in articulating and advocating foreign policy overseas would improve present operations. However, USTA should retain its policy information role. Two other proposals require further study: transfer to the State Department of the USTA's function of advising policymakers on the policy implications of foreign public opinion: and establishment of a new Information and Cultural Affairs Agency. Proposals contemplating a major t organization of U.S. public diplomacy seem more likely to hinder than to advance the efficiency and effectiveness of public diplomacy. A 1976 report recommended changes designed to improve the economy and efficiency of international radio broadcasting. Many of these changes have been implemented; for example: (1) a single corporation has been established which has facilitated integration of administrative services for Radio Free Europe and Radio Liberty; (2) the Agencies are installing a single salary and benefit system for their employees; (3) new program schedules have been established; and (4) separate newscooms have been combined. U.S. educational and cultural exchange programs serve an important national interest, but are susceptible to improvements. Reviews are being undertaken in this area. (RRS)

UNITED STATES GENERAL ACCOUNTING OFFICE Washington, D. 20548

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STATEMENT OF ELMER B. STAATS, COMPTROLLER GENERAL OF THE UNITED STATES BEFORE THE

SUBCOMMITTEE ON INTERNATIONAL OPERATIONS HOUSE COMMITTEE ON INTERNATIONAL RELATIONS ON

THE FUTURE OF U.S. PUBLIC DIPLOMACY

Mr. Chairman and Members of the Subcommittee:

I welcome this opportunity to discuss with you GAO's thinking on the subject of what has come to be called "public diplomacy"--international information, education, and cultural relations.

Public diplomacy today is of such importance that it deserves a new assessment to determine whether it is being adequately used to serve the national interest and to support our foreign policy objectives.

The question your Subcommittee has raised is whether these programs are organized, conducted and funded in a manner which will yield the optimum return on the taxpeyer's dollar, and whether various possible changes might permit significant improvement in their efficiency or impact.

That is of course a large question. Anything approaching a definitive answer would require more detailed and comprehensive study than has yet been undertaken by anyone. Much valuable work on this question has been done both in and out of Government. Much remains to be done. I am confident that the hearings you inaugurate today can greatly advance the effort.

As for GAO's part in evaluating and strengthening U.S. public diplomacy, we have made a number of studies which are listed in an appendix to this statement. They cover a wide range of subjects, including the East-West Center, military assistance training programs, the U.S. Information Agency, Radio Free Europe/Radio Liberty, the Inter-American Foundation, the African American Institute, and language training of Federal employees.

I should like today to confine my remarks on U.S. public diplomacy mainly to those aspects on which GAO has already done enough work to enable us either to draw some substantive conclusions or at least to discern the kinds of further study which might materially assist the Congress and the Administration in the ongoing effort to evaluate and improve these programs.

Accordingly, I propose to discuss GAO's conclusions and its plans for further study in three broad areas--

proposals to reorganize U.S. public diplomacy, the future of U.S. international broadcasting, and the conduct of U.S. international exchange-of-persons programs.

STANTON PANEL PROPOSALS TO REOPGANIZE U.S. PUBLIC DIPLOMACY

As I had occasion to observe, Mr. Chairman, in a recent exchange of letters with Dr. Frank Stanton—which are attached to my testimony and which you may wish to make part of this record—the interest we all share in improving U.S. public diplomacy raises issues on which reasonable and informed persons can differ. That has nowhere been more apparent than in the public consideration to date of the Stanton Panel proposals to reorganize U.S. information, cultural and broadcasting operations.

An Assessment of Proposals for Reorganization." was issued May 5. We undertook that review in an effort to assist the Congress and the public in their consideration of a most complex and controversial issue. As we anticipated, our report has elicited emphatic agreement and equally emphatic disagreement. Our observations on the Stanton Panel proposals may be summarized as follows.

We concluded that one of the Panel's major proposals would improve present operations; two others seem promising but require further study; and the remainder—which

contemplate a major reorganization—seem more likely to hinder than to advance the efficiency and effectiveness of U.S. public diplomacy. The latter proposals would achieve a certain tidiness on paper at the expense of arrangements that essentially have met the test of practicality and performance.

Policy Information Function

The Panel proposes to reassign to the State Department the U.S. Information Agency's role in articulating and advocating U.S. foreign policy overseas. This is based on the Panel's distinction between "policy" information—which covers the Government's "stance on foreign policy questions of immediate concern"—and "general" information.

Like many other observers, we believe the two kinds of information are often mutually reinforcing and difficult in practice to separate. The primary responsibility for articulating and advocating as well as formulating U.S. foreign policy is vested in the President and the Secretary of State. A major role of the U.S. Information Agency is to give resonance abroad to authoritative definitions and interpretations of that policy under State Department guidance. For the most part this work appears to be done professionally and to the State Department's general satisfaction. GAO believes the (1A should retain its policy information role.

Policy Advisory Function

The Panel also proposes to transfer to the State

Department the USIA's function of advising U.S. policymakers on the policy implications of foreign public

upinion. This function is in fact performed by several

Federal agencies. The USIA's cultural and media contacts

abroad enable it to make a distinctive advisory contribution.

There have been complaints, echoed by the Panel, that this advisory contribution has not been properly utilized. How adequately it is utilized, how much it differs from that of other agencies, and whether the "neglect" of USIA policy advice car be corrected by means other than transferring the advisory function are among the unanswered questions raised by this proposal. Pending further study of such questions, the present arrangement, we believe, should be left intact.

Establishment of new Information and Cultural Affairs Agency

The Panel proposes to consolidate the educational and cultural functions of the State Department's Bureau of Educational and Cultural Affairs and those of the USIA.

A single agency would be responsible for both the domestic and overseas aspects of U.S. general information, educational, and cultural programs. We believe, as do most persons we consulted, that such consolidation would be constructive. It would lead to more efficient and consistent administration of U.S. educational and cultural exchange programs.

Relationship of New Agency to Department of State

The Panel proposes that the new information and cultural agency be placed "under--but not in--the Department" as an "autonomous" agency on the model of the Arms Control and Disarmament Agency.

Both independent status for the new agency and the Panel's alternative have distinct advantages and short-comings. Either could work well. The choice should be based on a careful study of the pros and cons.

If the proposed new agency were assigned to State, however, some safeguards and some vigilance would be advisable to protect the agency's professional integrity and administrative independence while remaining under State Department and/or White House policy guidance.

Field Reorganization

The Panel proposes to reorganize U.S. overseas missions so that articulating "policy" information would be the exclusive responsibility of State Department officers while "general" information and cultural programs would be the province of information agency officers. This would fragment what the Panel itself describes as "the unified organization which has worked so effectively in the field for over twenty years."

of those activities in the overseas missions should be encouraged.

Voice of America

The Panel proposes to make the Voice of America an independent agency under its own board, asserting that this "would enable the VOA to function as a credible medium."

The Panel offers no evidence that present VOA broad-casts lack credibility, credence, or listenership. Audience research by the USIA and others in recent years suggests otherwise. Similarly, the Panel implies without attempting to demonstrate that VOA does not satisfy the needs of the Department of State. The evidence again points in the other direction. Implementing this proposal would add considerably to costs of operation.

How U.S. foreign policy is reported and advocated, especially by fast media and especially in moments of international crisis, can greatly affect the national interest for good or ill. For an agency billed and perceived as "the" Voice of America, there can be circumstances in which diplomatic needs must prevail over journalistic considerations.

It should be emphasized, however, that circumstances which have made it necessary for the State Department or White House to alter VOA programs of the USIA are highly unusual. The prerogative has been exercised with enough

restraint to preserve the professional character and reputation of VOA's news broadcasting.

Accordingly, we believe the present structural relationship between the Voice of America, the U.S. Information Agency, and the Department of State should be preserved, but efforts should be made to improve the working relationships.

Policy Information versus Culture

Dr. Stanton's letter to me of April 26 throws important further light on the reasoning by which he justifies the Panel's recommendations, and particularly on the underlying distinction the Panel draws between "policy information" and "deneral information." What he suggests is that Americans who articulate and advocate U.S. policy cannot be among the credible bearers or interpreters of American culture, or cannot effectively serve as intermediaries in facilitating intercultural relations. This, Dr. Stanton says, is because advocacy of U.S. foreign policy is biased and partisan. believe that the policy information and cultural functions are not so far apart in purpose and methods that they need to be administratively insulated from each other. Effective advocacy of foreign policy requires high standards of accuracy, candor, and even dialogue. If such work is understood and conducted in that manner, the problem of any incompatability between U.S. cultural activities and

policy advocacy disappears, and a unified operation becomes feasible and preferable.

There is thus a direct relationship between an organization's mission and the kind of structure it should have. It was in part with this in mind that we recommended in our report an effort by State and USIA to draw up a new "charter" for U.S. public diplomacy which would clarify the mission, goals, and operating guidelines for the conduct of U.S. public diplomacy. Development of a consensus on this among those concerned, both in and out of Government, would provide a sounder basis than now exists for further consideration of organizational problems and solutions.

U.S. INTERNATIONAL RADIO BROADCASTING

Let me now turn to the future of U.S. international radio broadcasting, which I believe is one of your principal concerns at present. GAO has dealt with major aspects of this question in two recent reports, one last year on "Suggestions to Improve Management of Radio Free Europe and Radio Liberty," and the other last month on "Public Diplomacy in the Years Ahead Assessment of Proposals for Reorganization." The latter deals with the placement of VOA which I discussed earlier.

The 1976 report on RFE/RL recommended changes designed to improve the economy and efficiency of the Radios as well

as to enhance the relationship between the Board for International Broadcasting (BIB) and the Radio management.

Progress in RFE/PL Consolidation

Many of the recommendations made to the Radios and the DIB have been implemented or are in the process of being implemented. For example:

- a single corporation has been established which consolidated the two separate corporate Boards and facilitated further integration of the Radios administrative services;
- . the Radios are installing a new single salary and benefit system for their employees;
- new program schedules have been established and three minor Soviet languages have been eliminated;
- . separate newsrooms have been combined;
- . the BIB is holding annual program reviews;
- . the BIB appoints the independent coditors to perform the financial audits of the Radios; and
- the Chairman of the BIB now attends the corporate board meetings of the Radios.

Pelations Between EIB and RFE/RL

Our report last year also observed that the Board for International Broadcasting needed to define clearly its role and its method of exercising oversight responsibility for Radio

Free Europe and Radio Liberty, because basic differences existed between the BIB and the Radios over the interpretation of the former's authority, functions, and responsibilities as set North in the Board for International Broadcasting Act.

We recommended that the BIB develop a definitive basic agreement defining its functions and those of the Radio's corporate board and management in carrying out the declared purposes of the Board for International Broadcasting Act of 1973, and that the BIB establish regulations to govern the implementation of its functions.

The Board passed a resolution authorizing the preparation of formal regulations to this effect, but these have not been established, and the problem remains unresolved.

Another approach to resolving the present RFE/RL management problem is embodied in an amendment to the BTB Act sponsored by Senators Pell and McGovern and approved last month by the Senate Foreign Relations Committee. That amendment stipulates that no Federal grant to Radio Free Europe/Radio Liberty may be made after January 1, 1978 unless the RFE/RL certificate of incorporation has been amended to provide that "The Board of Directors of RFE/RL, Inc., shall consist of the members of the Board for International Broadcasting and of no other members."

The amendment further provides that "such Board of Directors shall make all major policy determinations governing the operation of NFE/RL, Inc.; and shall appoint and fix the compensation of such managerial officers and employees of RFE/RL, Inc., as it deems necessary to carry out the purposes of this Act." The amendment increased the number of BIB members from six to ten, to permit inclusion of four members of the corporate board. The committee report suggests that the remaining members of the corporate board should serve as an advisory group.

I believe this proposed amendment, with some modification, would effectively resolve the present management problem while at the same time both preserving the Radios' professional integrity and providing for full congressional oversight.

The first modification I have in mind relates to the character and functions of the BIB and RFE/RL staffs. The essence of the present management problem is a disagreement, arising from differing interpretations of the statute, as to the functions of those staffs. What is needed is an arrangement under which the management and the oversight functions are clearly defined and carried out by separate staffs under BIB control. I believe the RFE/RL President as the Radios' chief operating officer should report directly to the Board and receive direction exclusively from the Board. Whether

he would remain in Washington or be assigned to the broadcasting center in Munich should be determined by the Board.

The head of the BIB staff, whose present title is Executive Director, should be responsible for helping the BIB carry out its oversight responsibilities—i.e. to monitor, study, evaluate, and audit the broadcasting operations—and its responsibilities for reporting and making recommendations to the President and the Congress. Perhaps a more appropriate title for a person with those functions would be Executive Secretary. He should be assisted by a small staff of a size and character to be determined by the Board.

Another modification to the Pell-McGovern amendment could be to include a few senior Government officials on the Board. The present proposal calls for a Board of nine "citizens of the United States who are not concurrently regular full-time employees of the United States Government" plus the corporate President as an ex officio, non-voting member. The appointment of two or three senior Government officials would add a valuable dimension to the oversight arrangements and would facilitate broader and closer communication and understanding between the Government and the radio operation.

As you will perhaps have noted, the structure that emerges from the Pell-McGovern amendment as modified in

this way has important features in common with a unique Federal institution created eight years ago on the initiative of a Committee under your Chairmanship. I refer to the Inter-American Foundation.

I believe that the Board for International Broadcasting, modified along the lines I have noted, could serve as a useful and effective tool of the U.S. Government. I must note however that some the practical and legal implications of this proposal need to be carefully examined before action is taken. Similarly, I believe it would be desirable to obtain the views and proposals of the Administration on this matter and of the Board for International Broadcasting when its new members are appointed.

RFE/RL Contingency Fund

One related matter I would like to touch on briefly, Mr. Chairman, is the \$5 million contingency fund which GAC

has proposed to enable the Radics to take care of the foreign currency fluctuations they experience in their operations overseas. We appreciate the strong support which your committee and the full committee have given to this proposal. We note, however, that the Senate Foreign Relations Committee did not include the provision for the fund in its substitute version of HR 6689, which is the companion bill to H.R. 6689 passed by the House authorizing funds for State Department, USIA, and BIB. We hope that in conference the House conferees will prevail and have the provision included in the final bill. The fund would, as you know, provide assurance that the Radios will be able to carry out their programs at the levels approved by Congress.

Without such a fund RFE/RL will continue to be faced with serious and unnecessary disruptions in its operations which are wasteful and deleterious to the successful accomplishment of their planned programs. The extraordinarily high proportion of operating costs which are paid in local currencies places the radios in a unique position among all of the U.S. agencies which operate overseas.

U.S. EDUCATIONAL AND CULTURAL EXCHANGE PROGRAMS--GAO REVIEW PLANS

Let me turn in conclusion, to the U.S. educational and cultural exchange programs.

From our work to date and from a symposium of Government and outside specialists on public diplomacy which GAO spon-6 months ago, it is clear that these programs, like the information programs, serve an important national interest, are being conducted professionally, and—at the same time—are susceptible to improvement in several respects.

While some improvement of U.S. public diplomacy can be achieved through organizational reform, most of the more promising prospects lie in other directions. In addition to clarifing the mission, gcals, and operating quidelines for the conduct of U.S. public diplomacy, as I mentioned previously, other efforts that are needed include establishing Government-wide leadership and coordination of information and cultural programs; improving the orientation and training of participants and practitioners; refining and more fully applying present techniques of program development and evaluation; and promoting wider public understanding, support and involvement.

In an effort to develop further some of these possibilities, GAO proposes to undertake the following additional reviews in the field of international education and cultural exchanges:

--a cost/benefit analysis on the establishment of a central inventory system on exchanges. In this

review, taking into account past efforts to establish an inventory system, we will seek to determine what type of information an inventory system should provide and how it can serve as a management and reporting tool for the agencies and the private sector, and to compare the expected benefits to the costs of establishing and maintaining it.

- --a study to determine whether the training of foreign military students includes appropriate efforts to promote understanding of the United States, and of mutual international problems, and how such efforts might be broadened:
- as a followup to our 1969 report. We will look at the Center's efforts to relate its activities more closely to those of USIA and the State Department and try to determine how well it is meeting its stated objectives. We also will be considering, at your suggestion, the appropriateness of applying the concepts and objectives

embodied in the East-West Center's operations to other geographic areas.

- on the selection and reception of, assistance to, and followup with foreign and American exchangees. Our objective will be to explore problems in administration and coordination of these programs with educators, administrators, and foreign student advisors at American universities and with the binational commissions overseas. In that effort we will also seek to assess the impact of these programs and to clarify the limits and possibilities of program evaluation. In this review, we will be alert to the concerns you expressed in your May 23 letter to me regarding the exchange of scholars with the Soviet Union.
- at U.S. universities and U.S. Government support of such programs to determine their adequacy in relation to national requirements, interactions with the exchange programs and the possible need for modifying priorities.

I should emphasize, that these plans are in a preliminary stage and are subject to change as developments and experience may dictate. In pursuing these plans, we hope to obtain useful comparative data about the programs of other countries, notably Britain, Canada, France, Germany, and Japan.

Taken together, these reviews should enable us to get a clearer picture of the impact of U.S. public diplomacy, and of the strengths, weaknesses, gaps and opportunities to which the Congress may wish to give further attention. They should also provide information to assist the Congress in determining the optimum level of funding for these programs.

It remains to be seen whether international public diplomacy will enjoy significant expansion under the impulse of the Helsinki Final Act. What is already clear is that those activities, all of which serve the great underlying principles of human rights and the free flow of information, have become, particularly since the Helsinki Conference. a fitting subject for intergovernmental discourse, and a proper concern of everyone. No longer can efforts to promote respect for those principles be plausibly dismissed as illegal impingements on national sovereignty. That is no small achievement.

You, Mr. Chairman, are to be commended for the leader-ship you have exerted to build on the Helsinki commitments and to focus continuing public attention on the manner in which signatory nations are fulfilling, ignoring, or abusing them.

This concludes my statement. I would be glad to have-

PREVIOUS GAO REPORTS RELATED TO TESTIMONY BEFORE THE HOUSE SUBCOMMITTEE ON INTERNATIONAL OPERATIONS

- A. REVIEW OF ACTIVITIES UNDER CONTRACT WITH THE AFRICAN-AMERICAN INSTITUTE, B-161632, July 2, 1968
- B. ACTIVITIES OF THE CENTER FOR CULTURAL AND TECHNICAL INTER-CHANGE BETWEEN EAST AND WEST, B-154135, May 20, 1969
- C. PROBLEMS IN ADMINISTRATION OF THE MILITARY ASSISTANCE TRAINING PROGRAM, B-163532, February 16, 1971
- D. U.S. GOVERNMENT MONIES PROVIDED TO RADIO FREE EUROPE AND RADIO LIBERTY, B-173239, May 25, 1972
- E. NEED TO IMPROVE LANGUAGE TRAINING PROGRAMS AND ASSIGNMENTS FOR U.S. GOVERNMENT PERSCRUEL OVERSEAS, B-176047, January 22, 1973
- F. TELLING AMERICA'S STORY TO I.E WORLD-PROBLEMS AND ISSUES, B-118654, March 24, 1974
- G. IMPROVEMENTS NEEDED IN LANGUAGE TRAINING AND ASSIGNMENTS FOR U.S. PERSONNEL OVERSEAS, ID-76-19, June 10, 1976
- H. SUGGESTIONS TO IMPROVE MANAGEMENT OF RADIO FREE EUROPE/ PADIO LIBERTY, ID-76-55, June 25, 1976
- I. NEED 'TO IMPROVE FOREIGN LANGUAGE TRAINING PROGRAMS AND ASSIGNMENTS FOR DEPARTMENT OF DEFENSE PERSONNEL, ID-76-73, November 24,1976
- J. MILLIONS OF DOLLARS OF COST INCURRED IN TRAINING FOREIGN MILITARY STUDENTS HAVE NOT BEEN RECOVERED, FGMSD-76-91, December 14, 1976
- K. DEFENSE ACTION TO PEDUCE CHARGES FOR FOREIGN MILITARY TRAINING WILL RESULT IN THE LOSS OF MILLIONS OF DOLLARS, FGMSD-77-17, February 23, 1977
- L. PUBLIC DIPLOMACY IN THE YEARS AHEAD -- AN ASSESSMENT OF PROPOSALS FOR REORGANIZATION, ID-77-21, May 5, 1977
- M. COST OF TRAINING GRANTED TO FOREIGN STUDENTS UNDER THE MILITARY ASSISTANCE PROGRAM, ID-76-79, May 17, 1977

FRANK STANTON 10 East 56 Street New York New York 10022

77 MAY 2 AID: 54

April 26, 1977

Dear Elmer:

In my note from London last month, I indicated that I would write of reference to the GAO's draft critique of proposals for reorganizing the international information, cultural and radio programs of the US government. As you know, my interest in this matter stems from the fact that the GAO is primarily concerned with -- and rather critical of -- the 1975 report of a Panel I chaired on this subject.

Perhaps it would be useful if I were to give you my conclusions and then try to fill in the details. It seems to me the following points should be made.

- 1. There was and still is an urgent need to restructure this government's international information, cultural and radio activities.

 Our Panel was created because the Senate Foreign Relations Committee and the USIA and CU Advisory Commissions believed that the programs required an urgent review and restructuring.
- 2. The Murphy Commission and the Congressional Research Service concluded as did our Panel, that what is loosely called public diplomacy is really composed of three distinct activities: policy information (spokesman), cultural communications and radio.
- 3. The Murphy Commission reviewed our recommendations and endorsed them. They did so after full consideration of the points of view expressed by our critics, for they had their day in court before the Commission. (The Murphy Commission's report was finalized four months after our report was published.)
- The practicality of our recommendations is documented by the experience of other countries which divide their so-called public diplomacy programs effectively into (policy) information, cultural and radio programs, each run under separate auspices. One has only to review the British, French and German programs in these areas to be persuaded of the logic of our proposals.

The GAO draft has not changed my view that, taken in their entirety, our Penel's "Recommendations for the Future" are still the best prescription for strengthening these functions of our government. But my concern is not solely parochial. The era of governmental reorganization that the Carter Administration has promised demands a careful weighing of the evidence and a straightforward, detailed appraisal of both problems and solutions. I believe that the GAO critique fails to treat fairly either the Panel's report or the real situation.

The Evidence

Though I do want to comment on the GAO's treatment of specific reorganization proposals in some detail. before doing so I would like to make a few observations about the draft as a whole. First, it strikes me that there is a pervasive, ill-concealed bies in the evidence which the GAO marshals against our "Recommendations." It is difficult to be specific, because is most cases the "critics" to which the GAO draft refers are not identified except by that label and as part of a sample of 75 "practitioners...outside specialists... and officials of US embassies ... whom the GAO representatives interviewed. With one exception, there is not a single specific opinion quoted in the 51-page draft favorable to the Parel's work. Thus the overall impression is that practitioners and officials of the US government are almost totally opposed to the "Recommendations." Members of our Panel, on the other hand, interviewed 98 individuals (each of whom is listed by name in our report), including three Secretaries of State, virtually all heads of USIA, CU and VOA, more than a dozen embassadors, and scores of PAOs and CAOs. The very least we could conclude from that larger end verifiable sample is that there were differences of opinion among those best informed, including a distinct majority view sympathetic to changes like those the Panel recommended in its published report.

Certainly there are individuals who are critical of the Panel's report. But there are also many favorable to our "Recommendations" whom the GAO -- disturbingly -- ignored or failed to mention. For instance, it is a fact that among the most senior USIA officers who have retired -- among those who have no axe to grind -- there is practically unanimous support for our recommendations.

While I have not been privy to the 1976 memorandum (to which the GAO refers on page 10) of the then leadership in the State Department, I am familiar enough with the circumstances surrounding it not to take it too seriously. Former USIA Director James Reagh's opposition to our report is well known. Equally well known, however, is the support of the Panel's recommendations by former Assistant Secretary of State for Educational and Cultural Affairs, John Richardson, and former VOA Director Kenneth Giddens, and their respective predecessors, as is the signed petition by 560 VOA staffars (published in November 1976) supporting independence of the Voice from USIA control. The GAO draft

makes much of the first set of opinions, but curiously omits completely the second. The same sort of selectivity is evident in the few cases where the draft cites hard data: the figures were almost all compiled by USIA management, chief among the Panel's critics. This bias is amply demonstrated in the one case where GAO cites Congressional Research Service as well as USIA data. In this case, USIA estimated less than 1/5 the savings CRS found likely to result from a Panel recommendation.

What The Panel Did

I am uneasy, too, about some of the GAC's inferences concerning the Panel's own work and conclusions. The draft notes quite correctly that two members did not approve our final recommendations. Since the Panel was composed of 21 prominent individuals, and since all of the other members subscribed to its report, this means that we achieved an overwhelming consensus. GAO also fails to note that one of the two dissenters simply did not participate in our work except for the initial full Panel meeting, and that the other actually did not dissent, but resigned from the Panel prior to the publication of the report (after voting for it in our concluding day-long session).

I find it astounding how consistently the draft's criticisms of our proposals seem to be based on facts or opinions originating in USIA, or otherwise related to the defense of USIA's vested interests. Moreover, in a few places GAC's thors imply that our Panel did not know what it was talking about, that its immendations were based "on a misreading of the work of certain agency (i.e., USIA) elements." When one considers that our Project Director spent over 30 years working his way from the bottom of USIA to the very top of its career ladier -- to say nothing of the expertise of the rest of the Panel -- this kind of insubstantisted assertion is hard to take seriously.

Regrettably, the GAO draft is also not free of misrepresentations and distortions of the Punel's substantive work. Many of these are specific to the Panel's recommendations and will be discussed later, but a few concern the overall thrust of the report and its philosophical basis.

For example, one of the GAO's central and oft-repeated arguments against our recommendations is that we do not explain the problems which they are supposed to solve; things are working very well just as they are, the GAO argument runs, so there is no reason to put the agencies through the "institutional treuma" likely to accompany their implementation. I find it a range that the draft's authors fail to explain, if there are so few problems, why the House, the Senate, the USIA and CU Alvisory Commissions, and even the GAO itself, at an earlier date, have called for studies and made recommendations for rationalizing this extraordinarily complex organizational structure. Furthermore, even

though the Panel commended these agencies' personnel for their past successes, it is not true that we failed to point out the problems needing attention. They are to be found all 'hrough the "Recommendations" (see especially page 4) and are succinctly summarized in its one-page conclusion. Moreover, the Panel designed its recommendations so as to avoid serious institutional disruption, and the report clearly explains (pages 37-39) how that can and should be insured. Indeed, we consciously set aside elaborate internal reorganization proposals so that these could be worked out gradually, without undue dislocation, after the formation of the new agencies. It is therefore simply not correct to imply that the Panel had not carefully weighed costs and benefits of change in developing its proposals, or that it does not specify the problems to which its solutions are addressed.

The most serious substantive deficiency of the GAO report is its apparent failure to understand the conceptual distinctions which lie at the heart of all the Panel's recommendations. When GAO cites, as grounds for opposing our report, the well-nigh unanimous opinion of selected practitioners that culture and information cannot be separated, I suspect that not only GAO but also most of those that interviewed do not wish to recognize, let alone understand, our central idea.

The key here is the distinction we make between policy information (spekesman) and "general information.' The fact is, of course, that all meaningful communication involves the transmission of some kind of information. So bringing a foreign people into touch with American culture involves transmitting information elect American culture, and the Panel in its report (and USIA in practice) defines culture very broadly to include all aspects of our domestic life as a nation and people. "Culture," therefore, includes "information," and not only information about the arts, letters, education and science, but also information about the American economy, governmental system, and even the views of our citizens on international affairs. This kind of information-about."

What culture does not include, and this is the critical point, is information that has to do with the explanation and advocacy of the US government's foreign policy (spokesman). We insist upon the separation of this "policy information" from all the "general information" about American culture for the simple reason that in this country, unlike authoritarian states, the government does not control culture. The genius of this country -- political, economic, social, and especially artistic -- lies in its intensely private and individualistic nature. For us to represent that society and culture overseas in a fashion which mixes it all up in the partisan advocacy and defense of our government's foreign policy is a betrayal in method of the very ideals we stand for. How can we expect foreign peoples to believe what we say about our free, open, and private society when they hear it from someone whose

primary job is to persuade them to support the latest US policy moves vis-a-vis Moscow or at the UN? This matter has perceptively been addressed by George Kennan, whose wise statement is, I understand, in your possession.

If you accept this basic need to keep the advocacy of foreign policy separate from general information about American culture and society, then the Panel's organizational recommendations flow almost inevitably from it. Establishment of the new Information & Cultural Agency (ICA), by ending the artificial separation between people-to-people programs and the media products and US officials with whom they must work, would provide an efficient organizational home for the effective overseas portrayal of our culture and society. The articulation, defense and advocacy of US foreign policy would center in law, as it does today in fact, in the President, Secretary of State, and overseas ambassadors who formulate the policy and understand it. The Voice of America would be relocated under a separate Board in order to free its news and general information programming from the pressures of day to day diplomatic crises while still allowing the policy defenders unrestricted access to the radio audience.

One more point here: We are the only democratic country in the world that fails to separate the spokesman role from cultural communications. Britain, France and West Germany, to cite but the most important of our allies, all have separate programs. So it can be done. Indeed, representatives of these countries wonder whether these programs can be at all successful if they are not separated. Moreover, we are the only country which puts the international radio operation under the same roof as policy information and cultural communications programs. I believe the worldwide reputation of BBC's external service is such that its model should be taken seriously.

Five Specific Recommendations

The GAO draft opposes all of our recommendations except one. With the foregoing as background, let me turn now to its specific objections to what the Panel proposed.

1. The GAO first rejects the idea of transferring USIA's policy information (spokesman) role into the Department of State. By proxy, it argues that policy and general information are mutually reinforcing and difficult to separate. The unnexed critics it approvingly quotes (without claiming they are in the majority) add that an overseas officer who defends US foreign policy along with portraying American society can do each job easier and more effectively.

It seems to me that two different matters are involved here. First, it may indeed be argued that the cultural sugar sweetens the foreign policy pill, that we can sell our foreign policy better if it is disguised by submersion in a cultural program. If so, that is a method based on deception which I believe we should reject as bound in the long run to fail. The reverse situation, however, that a cultural affairs officer's effectiveness would be enhanced by his being identified as a foreign policy advocate, seems to me patently absurd. In my opinion, culture explicitly dished out in the service of short-run policy could not fail to be rejected as biased and self-serving. Of course the cultural program must, as the Panel makes clear, support the long-range goals of our foreign policy. But protecting its effectiveness in doing that is precisely why it must be kept separate in the eyes of its audience from thort-run policy advocacy.

The GAO draft also argues that policy dissemination would be poorly done by the Department of State because it lacks the interest or skills to handle this essentially "journalistic" job. It occurs to me parenthetically that this reasoning may say more about the government's view of journalism than the GAC's view of our report. In my opinion, the advocacy of US foreign policy in not a journalist's job; it is closer to a lawyer's work. It is biased and bound to be partisan. US officials discussing US policy overseas are like Jody Powell, not like James Reston or Murray Marder. Confusion between these two roles is also evident where the draft quotes or echoes Edmund Fullion's remark that the Stat: Department could not clear commentaries fast enough. If these so-called "commentaries" are official, then they amount to policy itself and clearance must be part of their formulation; if they are really independent commentaries (such as might be used as part of VOA news and features), then "clearing" means censoring and is contrary to our most deeply ingrained values. Journalistic skills and speed are of course important to the policy information role, but the current Press Office has successfully carried out this function domestically for years and in the process has proven that State can do this kind of work. High level interest would be guaranteed by giving Deputy Under Secretary rank to the head of the new Office of Policy Information, and the personnel actually doing the job in the field would of course be mostly the same people who now do it for USIA.

Most remarkable about the GAO draft's treatment of this matter is that, in the end, it admits that there is a real problem here: USIA spokesmen need better information about what policy is. That, of course, aside from the need to separate it from general information, was our reason for putting policy information in State. USIA has been often and dramatically our of touch with the policy it is supposed to articulate, an inevitable state of

affairs so long as the agency which carries the policy information role remains an agency outside the State Department. And the credibility of a policy articulator depends on his authoritativeness, on repeated demonstration that he knows what he is talking about. The GAO lamely suggests an effort at inter-agency dialogue to resolve this problem. I can only point out that 25 years of dialogue has barely served to make workable, at great cost in time and energy, a system which fundamentally is poorly organized.

- 2. A second Panel recommendation which the GAO rejects is the transfer to State of the duty to advise US policy makers on the implications of foreign public opinion. This service is one our statesmen need when they formulate policies since the level of acceptance overseas is one of the factors that has to be taken into consideration. As the draft correctly points out, information of this kind reaches the top of the State Department from a variety of sources. The Panel's proposal would strengthen the flow of public opinion data, generated by press attaches, through Ambassadors to the Secretary of State; indeed, it would facilitate that movement by placing the information gatherers within (instead of outside) the State Department and hence organizationally and functionally closer to their Ambassadors. Creation of the ICA would, presumebly, result in information gathered by cultural officers reaching the Department of State only indirectly, but access to the ambassador in the field would be preserved by the country team concept. Moreover, the Panel assumed that the foreign policy maker needs to estimate foreign opinion about present or prospective US foreign policies, far more than about American society and culture. Since the official dealing with policy information is in the best position to estimate foreign reaction to it, his is the advice which must get through. This access is what the Panel's proposal provides.
 - 3. The third Fanel recommendation is, I am happy to say, accepted by the GAO draft. Unfortunately, accepting it while rejecting all the others so distorts its meaning as to make the resulting situation worse than today's status quo. The recommendation in question, of course, is the creation of a unified Information and Cultural Agency (ICA) out of the now-fragmented USIA and State Department Bureau of Educational and Cultural Affairs. GAO approves of this combination because it would promote organizational efficiency, programming consistency, and budgetary savings.

CAC insists, however, that the ICA include policy information. It then proceeds to criticize its version of the new agency for a series of problems which erise only because of the addition of that function. The government's constituents, it says, might not be willing to accept grants or from a propagenda agency; the new ICA might violate the an on domestic propaganda; and so on. Obviously, none of

these problems arise if the ICA sticks to general information, and they constitute enother group of reasons why the policy information function. should be performed elsewhere. That the GAO has not round any other solution to these problems becomes very clear at the end of the section, when the draft is unable to arrive at a clear recommendation as to how the ICA could otherwise be established.

In fact, there is no logical way to create the ICA and include policy information as part of its work. The results would be disastrous. Fulbright scholars would be handled by the same outfit that sells US foreign policy. As the GAO list of alternative models makes clear, no organizational relationship can be found which is satisfactory for both functions, i.e., independent for the cultural program yet intimately linked to State and the White House for policy information. The increasingly important reciprocal nature of the culturel program would have to be scrapped, or the spectre of a US government agency propagandizing the American people raised. Ultimately, the result would be the propagandizing of culture (which was the reason for separating the exchange program from USIA in the first place), or a policy information agency even more out of touch with what's really going on at State than is USIA today. The ICA simply will not work in the form GAO proposes.

4. A fourth Panel proposal, opposed like the first two by GAO, has to do with charges in the field organization of USIA and CU. Today's field organization does not reflect the Washington division between USIA and CU because USIA personnel execute all information and cultural programs overseas. The Panel noted that the lack of correspondence between the field and headquarters was probably beneficial to our overseas programming, but only because the current healquarters arrangement is so irrational and not because field arrangements are ideal. In fact, USIA control of CU overseas work is exceedingly frustrating for many cultural officers (who essentially must serve two masters) and for CU headquarters (whose overseas arm is emputated by the setup).

One has only to read the Resolution of the CU Advisory Commission of July 20, 1973, which perhaps more than any other factor was responsible for the creation of our Panel. It often means that the PAO, or USIA person who may serve as the ambassador's press officer, ignores the cultural side while concentrating on policy information work. Our "Recommendations" urged that this problem could be resolved if the press officer were attached to the ambassador (with whom he must work anyway) by placing him under the State Department's Office of Policy Information. The rest of the PAO's staff would be employed by the ICA, would continue working as a unit, but would report to only one executive in Washington.

The GAO raises a host of objections to this tidy arrangement. It condemns the Panel for disturbing a setup that works reasonably well instead of commending it for advocating a better method. It claims that jurisdictional problems will increase, when exactly the opposite is clearly the case. It argues that USIA personnel are better equipped than State's to do the press attache job, in spite of the fact that the Panel recommends transfer of USIA people working in policy information to the Department's new office handling that function. It maintains that (somehow) our proposal overlooks the country team corrept, when in fact we depend upon the team to handle the minimal coordination still needed between policy information and culture. Incredibly, it accuses us of exporting the "artificial division that now exists in Washington," when the obvious effect of our proposals is to end the artificial division between USIA and CU by com ing them into the ICA. In fact, the differing nature of the spokesman and altural communications makes a division between them essential, and that is the division which must be "exported" for the effective functioning of each. The current division between general information and exchange of persons is eliminated. The CAO critique completely ignores the fact that practically every embassy in Washington has a press attache and, at the same time, a cultural attache, both of whom report to the ambassador.

5. Finally, the GAO rejects the Panel's view that the Voice of America should be given a quasi-independent status under a board of overseers composed of three private citizens, the head of ICA, and the Deputy Under Secretary of State for Policy Information. The Panel developed this recommendation because VOA, an indivisible entity, must not only include policy and general information programming, but also must perform a news function essential to our national belief in the free flow of information.

Nothing is more important to the American moral position in the world than that this news be objective and free from political alteration by diplomats. Hence, we specified that a majority of the Board and its Chairman be appointed from the private sector. GAO agrees on the general need for objective news and on the likelihood that under current array ments diplomats can frustrate it when they choose to. But the draft ultimately argues that corruption of news is essential for reasons of state. I disagree. Government censorship of the news is contrary to our deepest values and grossly misrepresents us overseas. It also destroys our credibility when private news sources, the EBC, and Deutsche Welle, are all broadcasting the news we ignore.

In no sense do I suggest that the diplomate must be totally subservient to the newsmakers. What I do suggest is that neither should dominate the other. The GAO critique of the Panel's recommendations is based on the assumption that the national interest requires diplomats and journalists to act together in

spite of disagreement. In my view that is unnecessary. Hence, the Panel gave the diplomate in the Office of Policy Information unimpeded access to air time in order to make US foreign policy known, but also allowed the newscasters to do their job so long as they conform to accepted journalistic standards of verification and accuracy. If newsmen and diplomats disagree, so be it. We are a pluralistic society. Should American diplomats be embarrassed by news reporting, they can make it clear (as the VOA will) that news broadcasts are not controlled by the government and do not reflect government policy. Were such a tradition established, there would be no reason for embarrassment -- only pride.

Part of the GAO view here stems from the fact that the "Voice of America" is regarded as a US government radio -- really, the "Voice of the US Government, Executive Branch." Given recent Congressional-Executive differences, such a view even misrepresents US foreign policy, to say nothing of American society as a whole. The Voice of America should represent American culture and society in all its complexity, and the VOA must therefore be open to general information programming as well as the news and policy information. Coordination of these three functions will not be an easy task, but we believe that a five-man group of overseers representing all three interests can be so selected and appointed by the President and approved by the Senate as to do it wisely. To suggest (as GAO does) that the board might allow the newscasters to operate in a sensationalist manner is to essume not only that the 2/5 of the board representing the government will have no influence on its decisions, but also that the President and Congress will abdicate their responsibility.

In the end, after rejecting most of our report, the GAO draft is disappointingly vague about its recommendations for the future. Since it believes that existing arrangements have "met the test of practicality and performance," it is a fair inference that the draft comes down flat-footed for the status quo. We have seen only one apparent exception: it would move the State Department's Bureau of Educational and Cultural Affairs into USIA. Fortunately, it seems to me that Congress would hardly accept the submergence of the exchange of persons program in a "propaganda" (i.e., policy information) agency unless policy advocacy is returned to State, and the GAO is strongly against that.

Curiously, the only other recommendation the GAO draft maker is for a new comprehensive statement of CU-USIA mission and methods, another USIA idea. While I have nothing against this sort of effort, it clearly has little to do with

the organizational problems to which our report was directed. It would leave the defense of foreign policy to an agency separate from the home of policy, the State Department. It would leave the exchange of persons -- the part of cultural communications intended to be protected from current policy pressures -- within the State Department. It would maintain the costly and clumsy separation between exchange of persons and general information, while retaining the confusion of culture with foreign policy advocacy. It would leave cultural communications without an overseas arm of its own and cultural officers overseas attempting to serve two bosses. It would do nothing to protect the VOA against political pressures. These are the problems that need immediate attention; they are organicational problems demanding an organizational solution.

Our report is now two years old. It is time that we stopped studying and started addressing the real needs.

With all good wishes.

Sincerely.

Frank Stanton

The Honorable Elmer B. Staats Comptroller Jeneral of the United States Ceneral Accounting Office 411 G Street, NW Washington, DC 20548



COMPTROLLER GENERAL OF THE UNITED STATES WASHINGTON. D.C. 20548

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Dr. Frank Stanton 10 East 56 Street New York, New York 10222

Dear Frank:

I have your letter of April 26 commenting on a draft of our report, "Public Diplomacy in the Years Ahead-An Assessment of Proposals for Reorganization."

The interest we share in improving U.S. conduct of international information and cultural activities has raised issues on which reasonable and informed persons can (lifer.

Our report, issued on May 5, a copy of which has been sent to you, seeks to contribute to the current congressional and public consideration of those issues by clarifying and evaluating the practical implications of the Panel's proposals from our independent vantage point. Since our report takes issue with all but one of your proposals, your disappointment comes as no surprise. I feel compelled, however, to comment on your observation that our report did not fairly treat certain issues.

You suggest a bias in our report on the ground, in part, that it leaves the impression of almost universal opposition to the Panel's report and does not acknowledge that it has sany supporters.

Your suggestion fails to take into account these fasts about our report, which:

- --begins its discussion of each Panel proposal with both a summary of the proposal and a careful recapitulation of the Panel's own supporting argument, largely in the Panel's own words:
- --describes your report as "the product of a prominent and unusually well qualified group of individuals" (the published text adds that it "has gained support from other such persons");
- --points out that the Panel's report "has been (except for one minor proposal) fully endorsed by the Murphy Commission:"

- --records the general support among those we consulted for the Panel's proposal to consolidate the cultural functions of State and USIA; and
- --notes that the report was an outgrowth of concerns expressed by congressional committees and the advisory commissions among others over the effectiveness of U.S. public diplomacy.

Accordingly, I believe our report does take due note of the support your proposals have received.

You further suggest that our report offers criticism of the Panel's proposals that are "consistently * * * based on facts or opinions originating in USIA, or otherwise related to the defense of USIA's vested interests."

The sections in chapters 2 through 5 entitled "Response of Critics" offer, as our report explains, a synthesis of the views of others we consulted. Those sections are essentially confined to criticism of the Panel's proposals. There are three reasons for this:

- -- the Panel's own case is carefully set forth in our sections immediately preceding those covering the response of critics.
- --we found an impressive body of responsible opinion not only in USIA but in State and elsewhere strongly opposed to most of the Panel's proposals--opinion buttressed by facts and analyses that clearly deserved to be considered on their mer ts and that had not hitherto been brought together in a manner facilitating systematic consideration of your report and the alternatives.
- --very few of the favorable comments we heard added materially to the Panel's own statement of its rationale. Since our report sets forth that rationale, the inclusion of such additional comments would have been redundant.

Those sections in chapters 2 to 5, however, are not entirely confined to criticism: in a number of instances where the data we obtained did provide additional insights supportive of a Panel proposal, we took explicit account of them. You will find examples of this in our discussion of USIA's Wireless File (p.12 of the published report), possible variants to the proposed

Information and Cultural Affairs Agency (pp. 21-22), the options for relating the information-cultural agency to the State Department (pp.23-24), the need to protect the Voice of America's professional integrity (pp.29 and 32-33), and the importance of managing the proposed consolidation of U.S. cultural functions in a manner to prevent downgrading or politicizing our cultural programs (pp. 12 and 23).

Your letter states that you found "among those best informed * * * a distinct majority" sympathetic to the Panel's approach, and "practically unanimous support" among "the most senior USIA officers who have retired." So far at least as the surviving former directors of USIA are concerned, most of them share our assessment of the Panel's recommendations.

I must emphasize, however, that our review does not purport to have conducted a poll--among the "best informed" or any other group--to determine the ratio of yeas to mays. As noted above, our objective was to clarify and evaluate independently the practical implications of the Panel's proposals.

In this effort, as our report noted, "the insights of the working professionals have been indispensable." As our report also noted, however, we could not regard those insights as determinative, and we "also considered the views of qualified individuals whose personal or professional interests would not be affected by implementation of the Panel's report." Of the more than 100 persons we consulted for this review, some 27 were officers of the State Department and 20 of USIA in Washington. Of the remainder, some 41 were officers of one agency of the other stationed in four widely scattered U.S. embassies. We also consulted representatives of the Office of Management and Budget, National Security Council, Congressional Research Service, Murphy Commission, both U.S. Advisory Commissions, the academic community, and private organizations doing contract work for the Bureau of Educational and Cultural Affairs. As you know, we also studied the transcripts of the Panel's meetings with its witnesses.

In light of all these considerations, I believe your charge of bias is quite unwarranted.

Concerning your suggestion of misrepresentations and distortions, these appear to be little more than our differences with you in matters of interpretation and judgment. The only

example you cite is our statement that the Panel fails to identify the problems that its proposed reorganization would cure. That was and remains, in our view, one of the most serious and puzzling aspects of your Panel's report. When you cite pages 4 and 41 of your report to show that the Panel did identify the problems that would be solved by reorganization, it becomes clear that you have not understood our point. What your report describes on those pages is the present "organizational framework of public diplomacy," which the Panel regarded as "at variance with logic." What is missing in your report is any attempt to identify and demonstrate serious or chronic defects in the quality, efficiency, or impact of the country's information and cultural programs—defects of such nature and importance as to justify the major reorganization you propose.

As our report pointed out (pp. 6-7), "The Panel does not analyze the U.S. informational-cultural product, nor does it claim to have identify serious defects in it. Indeed, the report has high praise for the work of both adencies." The closest the Panel came to dealing with this crucial aspect of the matter appears in its statement that the proposed structural changes would "permit the deeper changes of content and purpose all desire." Your report does not clarify the nature of the "deeper changes" it anticipated beyond a passing reference elsewhere to the need for credible and reciprocal programs.

From your letter, and from our staff's recent interviews with you and the Panel's project director, however, it appears that you and at least some of your Panel associates did have serious reservations about the quality and relevance of these programs. Thus, you now say that "USIA has been often and cramatically out of touch with the policy it is supposed to articulate." That charge is not substantiated by the evidence we were able to get at State or elsewhere. But if the Panel believed that to be true, would it not have been the Panel's fundamental obligation to say so--and then to document it?

Concerning your view that our report is a defense of the status quo and that our recommendations are vague:

--We say in our report, "To question a particular set of proposals for reorganizing an institution is of course not to imply a blanket endorsement of the institution or to deny the need for constant adaptation to change."

- --Our report endorses one of the Panel's major proposals for reorganization (consolidating State's and USIA's cultural functions).
- --A careful reading of our report will disclose several other specific suggestions for change, or for study of possible change, including our proposal to develop a new charter for U.S. public diplomacy.
- --Our report states that GAO's review "is confined to the Stanton Panel recommendations." We did, however, enumerate in the final chapter "certain nonorganizational changes that we believe will merit consideration in the ongoing effort to improve U.S. public diplomacy." (We are currently conducting reviews of some of those other possibilities).

In your letter, you observed that the most serious deficiency of our report was its failure to understand your distinction between policy information and deneral information. On this issue, we can say little more than what we have already said--

"Like many other observers, GAO believes the two kinds of information are often mutually reinforcing and difficult in practice to separate. The primary responsibility for articulating and advocating as well as formulating U.S. foreign policy is vested in the President and the Secretary of State. A role of the U.S. Information Agency is to give resonance abroad to authoritative definitions and interpretations of that policy under State Department guidance. For the most part this work appears to be done professionally and to the State Department's general satisfaction. GAO believes the U.S. Information Agency should retain its policy information role."

We do not believe that information and cultural programs of other countries are in practice as hermetically compartmentalized as you suggest. We remain convinced that the present trend toward closer integration of U.S. work in this field should be encouraged.

Most of the other statements in your letter relate to our differences of interpretation or judgment on issues that perhaps, for present purposes, have been sufficiently explored in your report and ours. I might, however, make the following further observations:

- --Contrary to your letter, we heither endorsed nor rejected your Panel's proposal to transfer USIA's policy advisory function to the State Department. What we said was that this proposal raised at least four specific questions that should be clarified before a decision is reached.
- --Your suggestion that our report "is unable to arrive at a clear recommendation" as to how the information—cultural agency should be organized is puzzling. The report unambiguously recommends a unified information—cultural operation administered by a single agency with State Department policy quidance. As to whether the agency should retain USIA's present independent status or be assigned to State on the model of the Arms Control and Disarmament Agency, we said that either alternative could work, that each had dist not advantages and short—comings, and that the matter should be further studied.
- --Finally, as to whether the Voice of America should become independent as the Panel proposed--or "quasi-independent" as your letter puts it--there is nothing in our report that would remotely justify your inference that we regard the "corruption of news" as "essential for reasons of state." We believe the functions of government radio differ in some important respects from those of commercial broadcasting and that those differences must be appropriately reflected in structure and management. Moreover, we do not believe the case for VCA independence can rely on the question of credibility, because we found evidence that VOA has good credibility.

Sincerely yours,

Comptroller General of the United States