

**GAO**

Report to the Chairman, Subcommittee  
on International Organizations, Human  
Rights, and Oversight, Committee on  
Foreign Affairs, House of Representatives

---

January 2009

# BROADCASTING TO CUBA

## Actions Are Needed to Improve Strategy and Operations



G A O  
Accountability · Integrity · Reliability

# Highlights

Highlights of [GAO-09-127](#), a report to the Chairman, Subcommittee on International Organizations, Human Rights, and Oversight, Committee on Foreign Affairs, House of Representatives

## Why GAO Did This Study

For more than two decades, the U.S. government has been broadcasting to Cuba to break the Cuban government's information blockade and promote democracy in Cuba. Over this period, questions have been raised regarding the quality and effectiveness of these broadcasts. GAO was asked to examine (1) the Office of Cuba Broadcasting's (OCB) broadcasting approach and what is known about its audience; (2) how the Broadcasting Board of Governors (BBG)—which oversees U.S. government broadcasting—and OCB ensure compliance with journalistic principles; (3) steps taken to ensure adherence to domestic and international broadcasting laws, agreements, and standards; and (4) steps BBG and OCB have taken to address management challenges. GAO analyzed documentation related to strategic planning, audience research, oversight, and operations and interviewed officials from BBG, BBG's International Broadcasting Bureau (IBB), OCB, State, and other agencies.

## What GAO Recommends

GAO is making recommendations to BBG to analyze the relative return on investment from each of OCB's transmission methods, coordinate the sharing of audience research, enhance guidance and training to improve adherence to journalistic standards, ensure that inappropriate advertisements do not appear during OCB broadcasts, and improve communication with OCB employees. BBG generally agreed with the recommendations.

To view the full product, including the scope and methodology, click on [GAO-09-127](#). For more information, contact Jess Ford at (202) 512-4128 or [FordJ@gao.gov](mailto:FordJ@gao.gov).

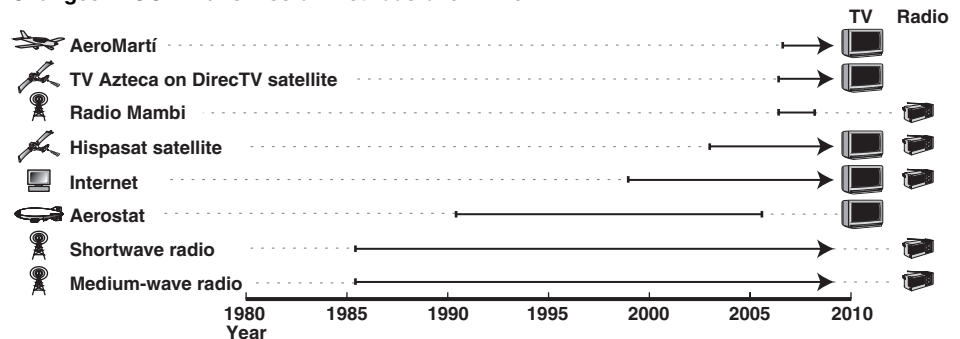
# BROADCASTING TO CUBA

## Actions Are Needed to Improve Strategy and Operations

### What GAO Found

OCB broadcasts Radio and TV Martí through multiple transmission methods that face varying levels of jamming by the Cuban government. While there are no nationally representative data and some surveys of recent Cuban émigrés suggest a larger audience, the best available research suggests that Radio and TV Martí's audience is small. Specifically, less than 2 percent of respondents to telephone surveys since 2003 reported tuning in to Radio or TV Martí during the past week. Despite the importance of audience research, we found minimal sharing of such research among available sources. Because of limitations in the audience research data, decisionmakers lack basic information to help assess the relative success or return on investment from each of OCB's transmission methods.

### Changes in OCB Transmission Methods over Time



Sources: GAO analysis of Office of Cuba Broadcasting and Department of State data; Nova Development (clip art).

BBG's IBB—which directly oversees OCB—has established an annual program review process that serves as the main mechanism for assessing OCB's compliance with journalistic standards. While IBB officials report that the quality of OCB programming has improved in recent years, IBB reviews since 2003 have recommended improving adherence to certain journalistic standards, particularly in the areas of balance and objectivity. IBB's process provides useful feedback, but we found weaknesses such as limited training and operational guidance for staff conducting the reviews.

OCB and IBB have taken steps to ensure that U.S. broadcasting adheres to relevant laws and standards, but some concerns remain. To comply with U.S. law, they have taken steps to minimize the domestic dissemination of OCB programming; however, OCB broadcasts reach U.S. audiences in several ways, such as through the Internet. In addition, a commercial TV station contracted to broadcast OCB programming showed some inappropriate advertisements during OCB programs. Furthermore, an international body found that OCB's TV broadcasts cause harmful interference to Cuban broadcasts, but the U.S. government has not taken steps to address this issue.

Despite some efforts by BBG and OCB, oversight entities have identified problems such as poor communication by OCB management and low employee morale. For example, OCB lacks formal mechanisms for communicating with or obtaining information from employees.

---

# Contents

---

<b>Letter</b>		1
	Results in Brief	2
	Background	6
	OCB Broadcasts to Cuba through Multiple Methods, but the Best Available Research Suggests That Radio and TV Martí's Audience Size Is Small	10
	IBB Identified Problems with OCB's Adherence to Journalistic Standards That OCB Has Not Fully Addressed, but IBB's Process Could Be Improved	26
	Steps Taken to Ensure U.S. Broadcasting to Cuba Adheres to Domestic and International Broadcasting Standards, but Some Concerns Remain	32
	Despite Some BBG and OCB Efforts, Oversight and Management Challenges Persist	36
	Conclusions	41
	Recommendations for Executive Action	42
	Agency Comments and Our Evaluation	42
<b>Appendix I</b>	<b>Scope and Methodology</b>	45
<b>Appendix II</b>	<b>Comments from the Broadcasting Board of Governors</b>	48
<b>Appendix III</b>	<b>GAO Contact and Staff Acknowledgments</b>	54
<b>Table</b>		
	Table 1: Key Roles and Relevant Offices of BBG, IBB, and OCB	7
<b>Figures</b>		
	Figure 1: OCB's Fiscal Year 2008 Budget Levels	9
	Figure 2: Radio Martí Transmission Methods	11
	Figure 3: TV Martí Transmission Methods	12
	Figure 4: Major Events and OCB Transmission Methods	14

---

Figure 5: Photographs of Reported Reception of TV Martí via AeroMartí in Cuba

---

**Abbreviations**

BBG	Broadcasting Board of Governors
CAFC	Commission for Assistance to a Free Cuba
FCC	Federal Communications Commission
IBB	International Broadcasting Bureau
ITU	International Telecommunication Union
OCB	Office of Cuba Broadcasting
OIG	Office of Inspector General
USINT	U.S. Interests Section, Havana
VOA	Voice of America

This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.



United States Government Accountability Office  
Washington, DC 20548

January 22, 2009

The Honorable William D. Delahunt  
Chairman  
Subcommittee on International Organizations,  
Human Rights, and Oversight  
Committee on Foreign Affairs  
House of Representatives

Dear Mr. Chairman:

The United States has been broadcasting to Cuba for more than two decades via Radio Martí (and subsequently TV Martí) to “break the information blockade” and promote freedom and democracy in Cuba. U.S. broadcasting to Cuba is performed by the Office of Cuba Broadcasting (OCB), which is a U.S. government entity overseen by the Broadcasting Board of Governors (BBG). OCB operates Radio and TV Martí, which broadcast news, commentary, and entertainment programming to Cuba 24 hours per day. From the inception of these broadcasting efforts, various questions have been raised regarding their purpose, quality, and effectiveness. In light of the more than \$500 million that has been spent over the years on broadcasting to Cuba and OCB’s \$34 million annual budget, you asked us to review a variety of issues related to the effectiveness of OCB management and broadcasts.

In response, this report examines (1) OCB’s approach for broadcasting and what is known about the size of its audience in Cuba; (2) how BBG—which oversees OCB—and OCB ensure compliance with journalistic principles; (3) steps taken to ensure that U.S. broadcasting to Cuba adheres to domestic and international broadcasting laws, agreements, and standards; and (4) management and oversight challenges, and the steps that BBG and OCB have taken to address those challenges.

To address these objectives, we analyzed documentation and interviewed officials from a variety of U.S. government agencies, including OCB, BBG, and the Department of State (State). To analyze OCB’s approach to broadcasting to Cuba and what is known about its audience size in Cuba, we reviewed documentation and interviewed officials from BBG and OCB and other relevant agencies, including State and the U.S. Agency for International Development and interviewed contractors responsible for maintenance of OCB transmissions and audience research. To identify the available information regarding the size of OCB’s audience, we analyzed

---

International Broadcasting Bureau (IBB) and OCB audience research from 2003 through 2008, including telephone surveys, focus group studies, and anecdotal reports of reception. We determined that these data were sufficiently reliable for the purpose of characterizing the size of Radio and TV Martí's audience in very broad terms for the populations the surveys reached. To review how BBG and OCB ensure compliance with journalistic principles, we analyzed documentation and interviewed officials from BBG's IBB, which is responsible for reviews of program quality, and interviewed officials from BBG and OCB. To understand the steps taken to adhere to domestic and international broadcasting laws, agreements, and standards, we interviewed officials from State and the Federal Communications Commission (FCC), reviewed documentation regarding complaints and decisions from the International Telecommunication Union (ITU), and reviewed relevant U.S. laws and legislative histories. To describe how BBG and OCB have addressed management and oversight challenges, we reviewed prior audit reports by the State Office of Inspector General (OIG); interviewed BBG, IBB, and OCB officials; and reviewed documentation related to previous management challenges and responses. Appendix I provides a more detailed discussion of our scope and methodology.

We conducted this performance audit from March 2008 to January 2009, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

---

## Results in Brief

OCB broadcasts Radio and TV Martí to Cuba through multiple transmission methods, but the best available research indicates that its audience is small. To overcome the Cuban government's jamming of its signals, OCB broadcasts radio through shortwave and medium wave (AM), satellite, and the Internet, and broadcasts television through an "over-the-air" broadcast via an airplane, satellites, and the Internet. Over the past 3 years, OCB has allocated significantly more of its resources for additional TV Martí transmissions, particularly the airplane, than Radio Martí transmissions. Due to the U.S. government's lack of access to Cuba, OCB has difficulty in obtaining nationally representative data on its audience size. In addition, decisionmakers have limited information to help assess the relative success or return on investment from each of OCB's various transmission methods. For example, it is impossible to determine from

---

IBB's telephone surveys whether TV Martí's audience is due to AeroMartí (which costs about \$5.0 million annually) or the DirecTV transmission (which costs about \$0.5 million annually). While there are no nationally representative data on the size of OCB's audience, the best available audience research (IBB telephone surveys) indicates that Radio and TV Martí's audience size is small, with less than 2 percent of respondents to telephone surveys since 2003 reporting that they had tuned in to Radio or TV Martí during the past week.<sup>1</sup> OCB broadcasts face jamming by the Cuban government. However, despite some efforts by IBB and OCB, they still lack reliable data on the number, type, and effectiveness of the signal jammers. As a result, it is unclear how much of the radio and television signals can be heard and seen in Cuba. Also, while OCB officials emphasized the changing media environment in Cuba and an increase in domestic and international broadcast competition as challenges for OCB in attracting and maintaining an audience, OCB could do more to address the challenges posed by its competitors in the Cuban media environment. Furthermore, although BBG coordinates with other agencies regarding U.S. policy toward Cuba, coordination is minimal on issues such as audience research. Finally, even though the United States has been broadcasting to Cuba for more than two decades, OCB lacks a formal strategic plan approved by BBG to guide decision making on its funding and operations.

IBB's annual reviews identify problems with OCB broadcasts' adherence to certain journalistic standards, but IBB's process has some weaknesses. IBB has an annual program review process that serves as the main tool for assessing OCB broadcasts' compliance with journalistic standards, such as accuracy, balance, and objectivity. Since 2003, IBB reviews have made recommendations to improve OCB's adherence to certain journalistic standards, particularly related to ensuring balance and objectivity, but OCB staff have received little training regarding compliance with journalistic standards. OCB has not ensured full implementation of these recommendations, but IBB has recently developed a process for improving its oversight of the implementation of such recommendations. While we found that IBB's process provides useful feedback regarding broadcast content and production quality, we identified several aspects of the

---

<sup>1</sup>Other information suggests that Radio and TV Martí's audience may be larger. For example, 21 and 45 percent of recent Cuban émigrés responding to an OCB survey reported watching TV Martí and listening to Radio Martí, respectively, in the 6 months before leaving Cuba. As we discuss later in this report, these results likely do not represent the actual size of Radio and TV Martí's audience.

---

process that could be improved. For example, IBB's qualitative reviews lacked consistency in their methodology and reporting and often do not clearly state whether the broadcasts are in full compliance with journalistic standards. In addition, while the program analysts who perform the reviews receive training regarding language, regional expertise, and technical production, they have received limited training regarding skills, such as program evaluation, to assist them in conducting program reviews.

IBB and OCB have taken a variety of steps to help ensure that U.S. broadcasting to Cuba adheres to domestic and international broadcasting laws, agreements, and standards; but several concerns remain. U.S. law<sup>2</sup> generally prohibits the domestic dissemination of public diplomacy information intended for foreign audiences, but legislation authorizing Radio and TV Martí allows some domestic dissemination in limited circumstances. IBB and OCB have taken a variety of steps to minimize the domestic dissemination of Radio and TV Martí programming, such as directing the three antennas used for OCB's AM radio broadcasts toward Cuba and away from the United States. In addition, according to IBB officials, in deciding which television station to contract with to place TV Martí programming on DirecTV, they evaluated the geographic coverage of each station's broadcasting, with the intent of minimizing domestic dissemination. However, both Radio and TV Martí broadcasts reach U.S. audiences in several ways. For example, residents of Miami can watch TV Martí programming on local cable or DirecTV, and anyone can access streaming video and audio from OCB's Internet site. In addition, some commercials shown by a Miami television station contracted to air TV Martí programming contained paid political advertisements during the programming, which IBB typically prohibits. BBG officials told us the standard contract language prohibiting the airing of political advertisements was inadvertently left out of the contract with the Miami television station. According to these officials, they have taken some steps to address this problem. However, no similar standard contract language prohibiting other potentially inappropriate commercials exists. Finally, in response to complaints by the Cuban government, the international body that serves as a forum for such disputes—the ITU—has found that U.S. television broadcasts (but not radio broadcasts<sup>3</sup>) cause harmful

---

<sup>2</sup>22 U.S.C. § 1461. Originally enacted as Section 501 of the U.S. Information and Educational Exchange Act of 1948, this law is commonly known as the Smith-Mundt Act.

<sup>3</sup>The ITU determined in December 2004 that, since Cuba has not registered a station on the 530 AM frequency, it cannot complain of harmful interference on that frequency.



---

interference with Cuban broadcasts. State officials indicated that no action has been taken in response to the ITU's determinations that U.S. television broadcasts cause harmful interference.

Despite some efforts by BBG and OCB, some oversight and management problems persist. Several entities—including BBG, IBB, and the State OIG—provide oversight of OCB operations.<sup>4</sup> For example, the State OIG has performed three inspections and audits related to OCB since 1999, each of which resulted in multiple recommendations. These various oversight efforts have identified three main categories of problems in recent years: poor communication by OCB management, low employee morale, and allegations of fraud and abuse.<sup>5</sup> For example, the State OIG has reported on OCB employees' desire to improve communication, and a recent Office of Personnel Management survey found that a majority of OCB employees who responded expressed concern about the information they receive from management on what is going on in the organization. OCB employees have specifically expressed frustration with the lack of any formal systems for disseminating information from management to staff or for staff to provide input to management. In responding to recent audit reports, BBG and OCB have taken steps to address nearly all of the auditors' recommendations.

In this report, we make recommendations to BBG to improve OCB's strategy and operations. We recommend that BBG conduct an analysis of the relative return on investment from OCB's various transmission methods and coordinate with other agencies, such as State and the U.S. Agency for International Development, to obtain additional information regarding the obstacles and effectiveness of Radio and TV Martí. We also recommend that BBG direct IBB to enhance guidance and training for program analysts conducting program reviews and take steps to ensure that political or other inappropriate advertisements do not air during OCB

---

<sup>4</sup>GAO's most recent review was completed in July 2008. See GAO, *Broadcasting to Cuba: Weaknesses in Contracting Practices Reduced Visibility into Selected Award Decisions*, GAO-08-764 (Washington, D.C.: July 11, 2008). In that report, we made five recommendations to improve contracting practices. Because these are recent recommendations, we are not assessing BBG's compliance with them in this report.

<sup>5</sup>One allegation of fraud and abuse, which BBG brought to the attention of the State OIG, has been substantiated in recent years. Investigators from our Office of Forensic Audits and Special Investigation found some indications of mismanagement, but much of the evidence was anecdotal or hearsay and did not provide a sufficient basis upon which to continue the investigation.

---

programming. In addition, we recommend that BBG direct OCB to provide staff with training regarding journalistic standards and establish mechanisms to improve communication with employees.

We received written comments on a draft of our report from BBG, which we have reprinted in appendix II. BBG indicated that it is in general agreement with all of the recommendations and will move to implement them, to the degree practicable. BBG also suggested that the draft report at times did not fully reflect the difficulties in broadcasting to a closed society or in evaluating the reach of broadcasts to a closed society. We believe the report addresses both issues appropriately. Regarding the difficulties in broadcasting to a closed society, the report has separate sections (in which BBG, IBB, and OCB officials are frequently cited) that discuss the challenges posed by Cuban government jamming and competitors in the Cuban media environment. Regarding the difficulties in evaluating the reach of broadcasts to Cuba, the report specifically acknowledges that significant challenges exist to conducting valid audience research in Cuba. For example, the report discusses the prohibition on conducting in-person audience research in Cuba and the lack of nationally representative data from telephone surveys. BBG also suggested that the draft report's discussion of a lack of a strategic plan was somewhat misleading. While the report acknowledges that coordination has occurred on some strategic issues, OCB's draft strategic plan (which was first presented in July 2007) has yet to be approved. We believe an approved strategic plan would be particularly valuable to decisionmakers as the new Congress and Administration seek to formulate the U.S. broadcasting strategy and make funding decisions. We also obtained technical comments from BBG and State, which we incorporated as appropriate.

---

## Background

In 1983, Congress passed the Radio Broadcasting to Cuba Act<sup>6</sup> to provide the people of Cuba, through Radio Martí, with information they would not ordinarily receive due to the censorship practices of the Cuban government. Subsequently, in 1990, Congress authorized U.S. television broadcasting to Cuba.<sup>7</sup> The objectives of Radio and TV Martí are to (1) support the right of the Cuban people to seek, receive, and impart information and ideas through any media and regardless of frontiers;

---

<sup>6</sup>Pub. L. No. 98-111 (1983).

<sup>7</sup>Pub. L. No. 101-246, §§ 241 to 248 (1990).

(2) be effective in furthering the open communication of information and ideas through the use of radio and television broadcasting to Cuba; (3) serve as a consistently reliable and authoritative source of accurate, objective, and comprehensive news; and (4) provide news, commentary, and other information about events in Cuba and elsewhere to promote the cause of freedom in Cuba.

OCB is a federal entity and is a part of BBG, which is an independent federal agency responsible for overseeing all U.S. government-sponsored, nonmilitary, international broadcasting programs. In addition to OCB, BBG also oversees the operations of IBB, which in turn oversees Voice of America (VOA). BBG also provides funding and oversight to three independent grantees: Middle East Broadcasting Networks, Inc.; Radio Free Europe/Radio Liberty; and Radio Free Asia (see table 1).

**Table 1: Key Roles and Relevant Offices of BBG, IBB, and OCB**

Agency	Key roles	Relevant offices
BBG	Oversee IBB and grantee broadcasters (Radio Free Europe/Radio Liberty, Radio Free Asia, and Middle East Broadcasting Networks)	Chief Financial Officer, General Counsel, and Strategic Planning and Performance Measurement
IBB	Oversee VOA and OCB	Performance Review, Civil Rights, and Human Resources
OCB	Operate U.S. broadcasting to Cuba via Radio and TV Martí	Technical Operations, Broadcast Operations, and Administration

Source: GAO analysis of Broadcasting Board of Governors documentation.

In October 2003, the President established the Commission for Assistance to a Free Cuba (CAFC) to identify measures to help bring about an end to the Castro government and support U.S. programs that could assist in an ensuing transition.<sup>8</sup> This commission published two interagency policy frameworks—the 2004 and 2006 Commission for Assistance to Free Cuba reports—which identify measures to (1) empower Cuban civil society, (2) break the Cuban government’s information blockade, (3) deny

<sup>8</sup>Commission members include all Cabinet-level agencies. The core agencies responsible for day-to-day operations of the commission include the Secretary of State (Chair); the Secretary of Commerce (Co-Chair); the Secretary of Housing and Urban Development; the Secretary of the Treasury; the Secretary of Homeland Security; the Assistant to the President for National Security Affairs; and the Administrator of the United States Agency for International Development, or their designees.

---

resources to the Cuban dictatorship, (4) illuminate the reality of Castro's Cuba, (5) encourage international efforts to support Cuban civil society, and (6) undermine the regime's "succession strategy." The CAFC reports make recommendations in a variety of areas, including measures to intensify efforts to break the Cuban government's information blockade, such as utilizing new methods to broadcast TV Martí. These reports also indicate that Radio and TV Martí are vehicles for facilitating the transition to democracy in Cuba, supporting Cuban democratic opposition, and empowering Cuban civil society. In addition, State and OCB officials indicate that Radio and TV Martí will be important platforms for providing information to Cubans during any future government transition.

OCB's role is to provide Cuba with the Spanish-language programming that one could access in an open society, including news and entertainment. In 2004, Radio Martí changed its programming from entertainment and news to an all-news format, and currently broadcasts news and information programming 6 days a week, 24 hours per day, and 1 day per week for 18 hours. Radio Martí's daily programming consists of 70 percent live news broadcasts, and 30 percent recorded programming with the ability to go live as needed. TV Martí broadcasts news (including two live newscasts), sports and entertainment, and special programming.

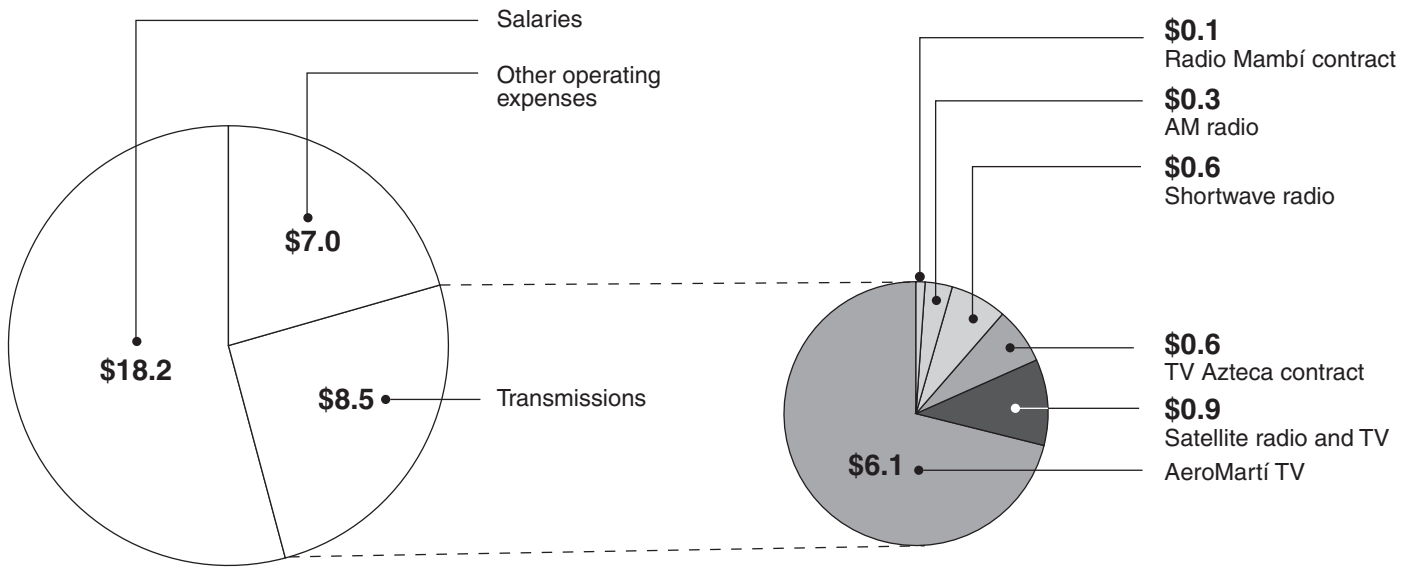
OCB has 167 authorized direct-hire positions and approximately 120 talent contractors.<sup>9</sup> OCB's fiscal year 2008 budget was approximately \$34 million, including about \$18 million for salaries, \$7 million for general operating expenses, and almost \$9 million for transmissions. Figure 1 shows a breakdown of OCB's budget.

---

<sup>9</sup>Talent contractors include writers, performers, program hosts, reporters, and technical support required to produce and broadcast radio and television news and entertainment programming.

**Figure 1: OCB's Fiscal Year 2008 Budget Levels**

Dollars in millions



Total: \$33.7 million

- Radio
- TV
- Radio and TV

Source: GAO analysis of Office of Cuba Broadcasting data.

Note: Numbers may not sum correctly due to rounding.

---

## OCB Broadcasts to Cuba through Multiple Methods, but the Best Available Research Suggests That Radio and TV Martí's Audience Size Is Small

OCB broadcasts Radio and TV Martí to Cuba through multiple transmission delivery methods to overcome the Cuban government's jamming of certain signals, with a recent focus on providing more of its resources for TV transmissions. Due to the U.S. government's lack of access to Cuba, OCB has difficulty in obtaining nationally representative data on its audience size. The best available research (from IBB telephone surveys) indicates that Radio and TV Martí's audience size is small, due in part to signal jamming<sup>10</sup> by the Cuban government. IBB and OCB have made some efforts to gain information on the extent and impact of jamming; however, they still lack data on the number, type, and effectiveness of the jammers. In addition, Radio and TV Martí broadcasts face the challenge of competition from domestic and international media, which OCB could do more to address. Furthermore, coordination with other relevant U.S. agencies to share audience research to Cuba is minimal. Finally, OCB has conducted some strategic planning exercises, but lacks a strategic plan that BBG has approved.

---

## OCB Broadcasts Radio and TV Martí through Multiple Transmission Delivery Methods, with a Recent Focus on TV Transmissions

OCB broadcasts Radio and TV Martí through multiple transmission delivery methods in an effort to overcome the Cuban government's attempt to block, or jam, these broadcasts, thereby preventing them from reaching a Cuban audience. OCB broadcasts radio through shortwave, AM, two subchannels on Hispasat<sup>11</sup> satellite television, and the Internet. Figure 2 shows the cost, broadcast schedule, and projected coverage (in the absence of Cuban jamming or counter-broadcasting<sup>12</sup>) of Radio Martí.

---

<sup>10</sup>Jamming refers to the deliberate use of radio noise or signals to prevent the listening or viewing of broadcasts.

<sup>11</sup>Hispasat is a company that offers satellite communications services.

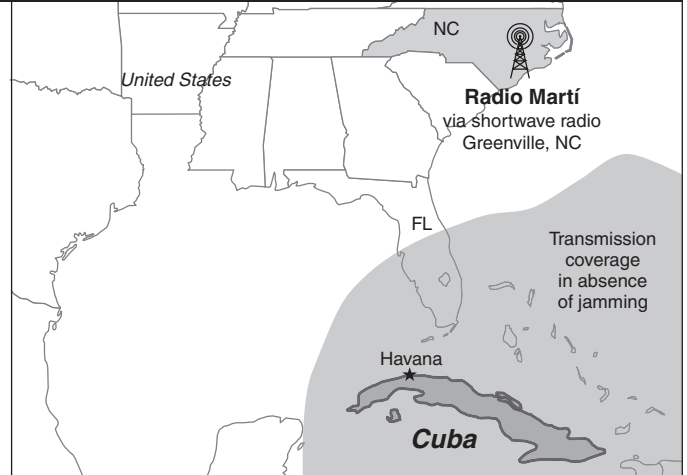
<sup>12</sup>We use the term counter-broadcasting in this report when we refer to the Cuban government's efforts to disrupt the reception of Radio Martí by broadcasting programming on the same frequency that Radio Martí uses.

**Figure 2: Radio Martí Transmission Methods**

**Radio Martí – shortwave radio**

- Broadcast on three shortwave frequencies
- Partially jammed
- Cost: approximately \$550,000 per year (FY 2008 estimate)

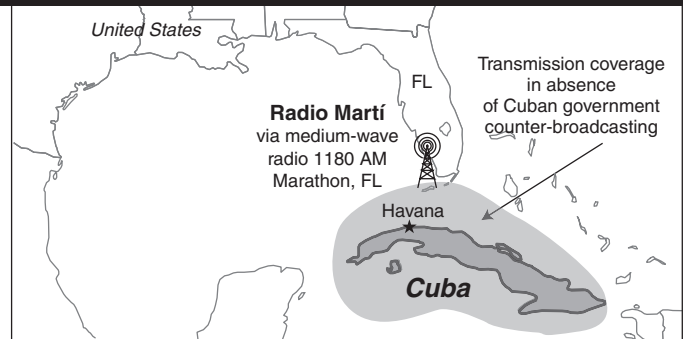
Weekdays and weekends



**Radio Martí – medium-wave radio**

- Impacted by Cuban government counter-broadcasting
- Cost: approximately \$300,000 per year

Weekdays and weekends<sup>a</sup>



**Radio Martí – Hispasat satellite**

- Direct-to-home satellite
- No jamming reported
- Cost: \$388,800 per year for both Radio and TV Martí

Weekdays and weekends



Sources: GAO analysis of Office of Cuba Broadcasting and International Broadcasting Bureau data; Nova Development (clip art); and Map Resources (maps).

<sup>a</sup>Radio Martí's medium-wave transmission broadcasts 24 hours per day, 7 days a week, except for 6 hours on Mondays.

OCB broadcasts TV Martí through satellite television (Hispasat and DirecTV), an over-the-air transmission via an airplane (AeroMartí), and the Internet. Figure 3 shows the cost, broadcast schedule, and projected coverage (in the absence of Cuban jamming) of TV Martí.

**Figure 3: TV Martí Transmission Methods**

**TV Martí – Hispasat satellite**

- Direct-to-home satellite
- No jamming reported
- Cost: \$388,800 per year for both Radio and TV Martí

Weekdays and weekends



24 hours per day



**TV Martí – DirecTV satellite**

- No jamming reported
- Cost: approximately \$464,900 per year (FY 2008 estimate)

Weekdays



6:00 p.m. to 6:30 p.m.  
11:30 p.m. to 2:00 a.m.

Weekends



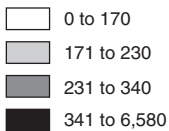
12:00 a.m. to 2:00 a.m.



**TV Martí – AeroMartí**



Cuba map:  
population density:  
people per square mile

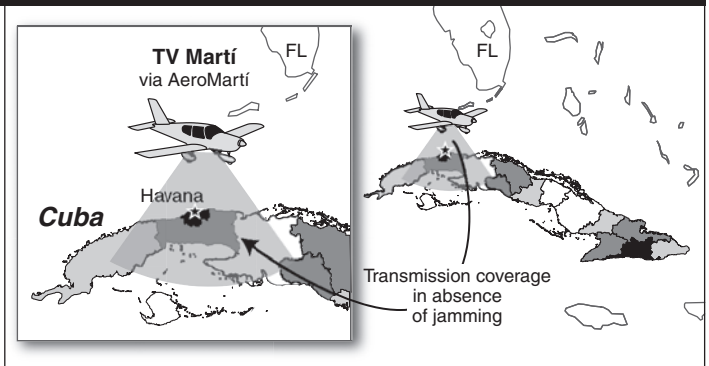


- Flies over United States waters
- Broadcasts on channel 20
- Partial jamming reported
- Cost: approximately \$5 million per year for air services and fuel

Monday to Saturday



6:00 p.m. to 11:00 p.m.



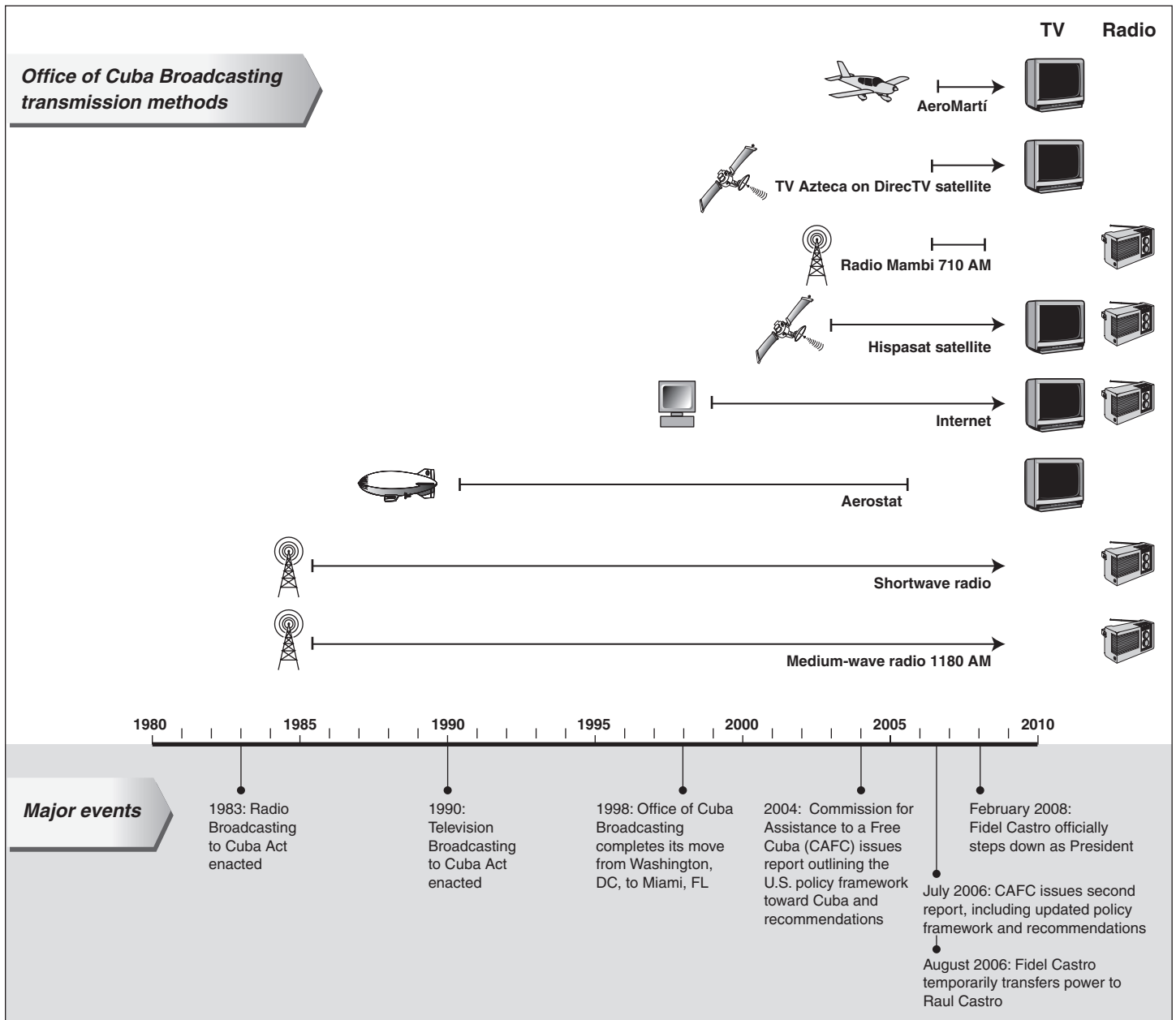
Sources: GAO analysis of Office of Cuba Broadcasting and International Broadcasting Bureau data; Nova Development (clip art); Map Art and Map Info (maps); and Cuba National Statistical Office (population density data).



---

Over the past 3 years, OCB added more transmission delivery methods and devoted more resources for TV Martí than for Radio Martí (see fig. 4). The 2004 and 2006 CAFC reports recommended that OCB explore additional transmission methods, including the use of airborne platforms and satellite television, to further efforts to break the information blockade in Cuba. In October 2006, OCB launched AeroMartí, which consists of two Gulfstream propeller airplanes that OCB leases to broadcast television signals to Cuba. In December 2006, IBB leased airtime on TV Azteca, a commercial television station in Miami that is carried on the DirecTV satellite.

**Figure 4: Major Events and OCB Transmission Methods**



Sources: GAO analysis of Office of Cuba Broadcasting and Department of State data; Nova Development (clip art).

---

Due in large part to the launch of AeroMartí, most of OCB's budget for transmission costs is spent on TV Martí. In fiscal year 2008, OCB spent over \$6 million on AeroMartí, which includes about \$5 million for fuel, operation, and maintenance of the airplanes and about \$1 million to equip one airplane with the ability to broadcast on channel 13.<sup>13</sup> Additional OCB resources were focused on TV Martí transmissions because BBG and OCB felt there were more opportunities to expand the size of the audience of TV Martí than that of Radio Martí.<sup>14</sup> Prior to its use of AeroMartí, OCB transmitted TV Martí through an aerostat (blimp) in the Florida Keys. The aerostat was destroyed by a hurricane in 2005. BBG, IBB, and OCB officials believe that AeroMartí is more effective than the aerostat due to its technological capabilities. In December 2006, IBB began leasing 1 hour of airtime from 12:00 midnight to 1:00 a.m. on weeknights on a commercial AM radio station in Miami (Radio Mambi), at a cost of about \$183,000 for a 6-month period. However, due to budget constraints, IBB canceled its contract with this station in February 2008.<sup>15</sup>

In addition to investing in new transmission methods for TV Martí, OCB has taken steps to improve the production quality of its television programming. For example, instead of broadcasting taped newscasts, in October 2006, OCB began airing a live news broadcast at 6:00 p.m., with updates at 10:00 p.m. According to IBB officials, the production quality of TV Martí programming has also improved through OCB's use of more original programming, well-designed graphics, and upgraded sets.

In anticipation of greater Internet availability and use in Cuba, OCB's Director said that OCB is beginning to focus more attention on improving its Web site.<sup>16</sup> For example, OCB officials said they are in the process of redesigning OCB's Web site and have trained staff on digital journalism. However, Cubans' ownership of personal computers is limited, and the

---

<sup>13</sup>According to BBG officials, broadcasting on channel 13 will make TV Martí available to Cubans whose televisions are unable to receive TV Martí broadcasts on channel 20.

<sup>14</sup>According to BBG officials, they explored broadcasting Radio Martí to Cuba from a medium-wave (AM) station in the Caribbean and prepared all materials and delivered the application to the proper authorities in the summer of 2005. By September 2006, BBG still had not received approval, so to improve AM transmissions to Cuba, BBG pursued the leasing of time on AM transmitters from private stations in Florida.

<sup>15</sup>As of February 2008, obligations for radio broadcasting services via Radio Mambi totaled \$438,000.

<sup>16</sup>OCB's Web site is <http://www.martinoticias.com/>.

---

Cuban government tightly restricts Internet access to Cubans. According to OCB officials, some Cubans access OCB's Web site using foreign Internet service providers, and, as a result, OCB is unable to determine the number of hits on its Web site that originate from Cuba.

---

**Significant Challenges Exist to Conducting Valid Audience Research; Available Data Provide Little Information for Assessing Relative Success of Different Transmission Methods**

BBG; IBB; OCB; and U.S. Interests Section, Havana (USINT)<sup>17</sup> officials emphasized that they face significant challenges in conducting valid audience research due to the closed nature of Cuban society. For example, U.S. government officials stationed in Havana are prohibited by the Cuban government from traveling outside of Havana. Also, IBB researchers believe that the Cuban government would not permit U.S. government-funded organizations to conduct audience research on Radio and TV Martí in Cuba. According to State, it is difficult to travel to Cuba for the purpose of conducting audience research. In addition, the Department of the Treasury (Treasury) prohibits BBG from conducting in-person audience research surveys in Cuba.<sup>18</sup> BBG also notes that the threat of Cuban government surveillance and reprisals for interviewers and respondents raise concerns, such as respondents' willingness to answer sensitive questions frankly.

Despite these limitations, IBB, OCB, and USINT conduct a variety of research efforts to obtain information on Radio and TV Martí's audience size, characteristics, reaction to programming, and preferences. To measure audience size, IBB periodically commissions international telephone surveys. IBB also periodically commissions monitoring panels and focus groups in Miami with recent Cuban arrivals to the United States to solicit their feedback on the content and production quality of OCB programming and to obtain information about their radio and television use, preferences, and experiences in Cuba. OCB contracts with a local Miami market research firm that conducts monitoring panels once a month and conducts surveys twice a year to solicit recent Cuban arrivals' feedback on the quality of TV Martí programming and to obtain information about their media habits and perceptions of Radio and TV Martí programming. In addition, USINT has occasionally administered

---

<sup>17</sup>USINT is a State post that represents U.S. interests in Cuba.

<sup>18</sup>In 2002, BBG requested a Treasury Office of Foreign Assets Control license that would authorize BBG and InterMedia, IBB's main audience research contractor, to conduct audience research in Cuba. Treasury denied BBG's request.

---

informal surveys of Cubans visiting USINT, which asked, among other things, whether visitors listened to and watched Radio and TV Martí.

BBG, IBB, and OCB officials indicated that research on Radio and TV Martí's audience size faces significant limitations, such as none of these data are representative of the entire Cuban population. IBB's telephone surveys are IBB's only random data collection effort in Cuba, but these data might not be representative of Cubans' media habits for two main reasons: (1) Only adults in homes with published telephone numbers are surveyed, and, according to BBG documents, approximately 17 percent of Cuban adults live in households with published telephone numbers; and (2) BBG and OCB officials noted that, because individuals in Cuba are discouraged or prohibited by their government from listening to and watching U.S. international broadcasts, they might be fearful of responding to media surveys and disclosing their media habits, and thus actual audience size might be larger than survey results.<sup>19</sup>

The various research efforts that IBB, OCB, and USINT have undertaken provide decisionmakers with limited information to help assess the relative success or return on investment from U.S. broadcasting to Cuba. For example, at a strategic level, documents produced as a part of BBG's annual Language Service Review process contain data on the cost per listener. However, we found that although documents from the 2004 and 2005 Language Service Reviews of OCB included such data, documents from the 2006, 2007, and 2008 Language Service Reviews of OCB listed this information as "not available." This is because the news and programming operations and budgets for Radio and TV Martí were merged in fiscal year 2005, thus making it impossible to separate the budgets (and, therefore, the cost per listener) for Radio and TV Martí.

In addition, the research efforts provide decisionmakers with limited information on the relative return on investment from each of the individual transmission methods OCB uses. For example, the IBB telephone surveys do not include questions on the transmission method—such as shortwave or medium-wave radio, satellite television, AeroMartí, or the Internet—that respondents used to listen to or watch Radio and TV Martí. As a result, it is impossible to determine from the telephone surveys

---

<sup>19</sup>In each of the telephone surveys conducted since 2005, interviewers indicated that 6 percent or less of respondents expressed or demonstrated signs of fear when answering questions over the telephone.

---

whether TV Martí's audience is due to AeroMartí (which costs about \$5.0 million annually) or the DirecTV transmission (which costs about \$0.5 million annually).

Furthermore, other officials have suggested that the current methods used to broadcast to Cuba may not be the most cost-effective way to reach a Cuban audience. For example, a USINT official stated that the most successful distribution of TV Martí has been via DVD (rather than satellite or over-the-air AeroMartí broadcasts) and suggested that there could be avenues for others to increase the distribution of DVDs throughout Cuban society.

---

### No Nationally Representative Data on OCB's Audience Exists, but the Best Available Audience Research Suggests That Radio and TV Martí's Audience Size Is Small

Despite the lack of reliable nationally representative data, BBG has determined that telephone surveys conducted from outside Cuba are among the best available and most cost-effective methods of estimating audience size for Radio and TV Martí. These surveys indicate that Radio and TV Martí's audience size is small.<sup>20</sup> Regarding radio broadcasting, less than 2 percent of respondents to IBB's telephone surveys in 2003, 2005, and 2006 said they listened to Radio Martí during the past week.<sup>21</sup> In 2008, less than 1 percent of respondents said they listened to Radio Martí during the past week.<sup>22</sup> Regarding television broadcasting, IBB audience research indicates that TV Martí's audience size is small. All of IBB's telephone surveys since 2003 show that less than 1 percent of respondents said they watched TV Martí during the past week. Notably, results from the 2006 and 2008 telephone surveys show no increase in reported TV Martí viewership following the launch of AeroMartí and DirecTV broadcasting in 2006.

---

<sup>20</sup>IBB commissioned telephone surveys in 2003, 2005, 2006, and 2008. In each year's telephone survey, an IBB subcontractor from a third country conducted telephone interviews with at least 1,200 Cubans.

<sup>21</sup>BBG's standard for measurement of audiences is the number of adults who "listened or viewed last week," as determined by random sampling in a target area. Like all BBG media surveys, IBB telephone surveys of Cubans also ask about listening and viewing habits over the past month, year, and ever.

<sup>22</sup>Comparisons of past year listenership for Radio Martí across recent IBB telephone surveys indicate a recent decline in Radio Martí listenership. IBB research staff and the contractor who conducted the survey are still analyzing the results and attempting to identify the factors contributing to the reported decline in Radio Martí's audience. However, reported listenership and viewership of all international radio and television programming has declined. IBB staff said this decline could be due to an across-the-board reduction in the willingness of Cubans on the island to acknowledge accessing international media.

---

Similarly, very few participants in IBB-commissioned focus groups said that they had seen TV Martí in Cuba.

Despite the small number of Cubans who reported listening to or viewing Radio or TV Martí in IBB telephone surveys, OCB officials told us that other information suggests that Radio and TV Martí have a larger audience in Cuba. For example, a 2007 survey that OCB commissioned, intended to obtain information on programming preferences and media habits, also contained data on Radio and TV Martí's audience size. While the survey was not intended to measure listening rates or project audience size, this nonrandom survey of 382 Cubans who had recently arrived in the United States found that 45 percent of respondents reported listening to Radio Martí and that 21 percent reported watching TV Martí within the last 6 months before leaving Cuba. However, these results may not represent the actual size of Radio and TV Martí's audience because (1) according to BBG officials, higher viewing and listening rates are expected among recent arrivals<sup>23</sup> and (2) the demographic characteristics of the respondents to this survey did not reflect the Cuban population in all aspects.

In addition, OCB receives anecdotal information about its audience. BBG's Executive Director said that, in the case of a closed society, such anecdotal and testimonial reports of reception are evidence that a broadcast has a significant audience. (See fig. 5 for an example of reported reception of TV Martí via AeroMartí in Cuba.) As an illustration, OCB reported that Radio Martí's coverage of Hurricane Ike, which struck Cuba in September 2008, was widely heard in Cuba, with callers from all over Cuba providing updated information on the situation to OCB. We also reviewed letters and records of telephone calls from Cubans to OCB. Following our observation that it does not track this information systematically, OCB began doing so in August 2008.

---

<sup>23</sup>According to BBG's Executive Director, research during the Cold War showed that surveys of recent arrivals from communist countries that limited citizens' access to information consistently overstated the actual audience size by a factor of three.

**Figure 5: Photographs of Reported Reception of TV Martí via AeroMartí in Cuba**



Source: Misceláneas de Cuba.

Note: These photographs, provided by an organization that reports on Cuban affairs, reportedly depict evidence of Cubans' ability to watch TV Martí despite Cuban jamming efforts. The TV Martí logo can be seen in the bottom right-hand corner of three of these photographs.

## OCB Broadcasts Face Jamming, but OCB Lacks Comprehensive, Reliable Data on the Extent of Jamming

The Cuban government jams Radio Martí's shortwave signals and interferes with Radio Martí's AM signals by counter-broadcasting at a higher power level on the same frequency. OCB tries to overcome jamming of its shortwave signals by broadcasting on three different frequencies per hour until 12:00 midnight and on two different frequencies per hour from 12:00 midnight to 6:00 a.m., while also changing its shortwave frequencies several times throughout the day. To overcome Cuban government counter-broadcasting of its AM broadcasts, OCB increases signal power during daylight hours. According to OCB, the Cuban government's counter-broadcasting is largely effective in and around Havana and several other large cities, but probably has little impact outside these areas. Recently arrived Cubans who participated in IBB-commissioned focus groups reported that signal jamming and counter-broadcasting by the Cuban government made it difficult for them to listen to Radio Martí.



---

The Cuban government also jams TV Martí's signals from AeroMartí.<sup>24</sup> According to OCB engineers, the jamming attempts to disrupt the signal reaching televisions in Cuba (rather than at the transmitter). OCB engineers said that because AeroMartí's signal is transmitted from a high-altitude, constantly moving platform, they believe jamming is less effective, but this has not been confirmed. A February 2008 OCB assessment of Cuban jamming states that "Cuba would need many thousands of additional jammers to totally block TV Martí." However, according to IBB's research contractor, none of the 533 respondents to IBB's 2008 telephone survey living in Havana reported watching TV Martí broadcasts during the past 12 months.<sup>25</sup> In addition, recently arrived Cubans who participated in IBB-commissioned focus groups reported that signal jamming of TV Martí's over-the-air broadcast via AeroMartí made it difficult for them to view TV Martí. USINT officials also said that Cuban government jamming of AeroMartí prevented them from viewing over-the-air TV Martí broadcasts.

In recent years, IBB and OCB have attempted to better understand and quantify the extent of Cuban jamming and its impact on the technical reception of Radio and TV Martí broadcasts. Despite their efforts, IBB and OCB still lack reliable data on the number, location, type, and effectiveness of Cuban jamming equipment. As a result, it is unclear how much of the radio and television signals can be heard and seen in Cuba. For example, OCB recently asked AeroMartí's contractor to study AeroMartí's capabilities and effectiveness in the presence and absence of jamming. The contractor developed a model and estimated that AeroMartí's broadcasts had a potential viewing audience of about 40 percent of the Cuban population in the absence of jamming and at least 20 percent of the population in the presence of Cuban jamming. This estimate, however, assumed that the Cuban government uses four jammers in fixed locations in the Havana area. OCB's Director of Engineering said that the assumption that Cuba has four fixed jammers is based on observations made in the 1990s by a USINT public affairs officer and defecting Cuban jamming technicians. Given the dated nature of the assumption, the estimates regarding AeroMartí's potential viewing audience might be unreliable, and, therefore, the validity of the study's

---

<sup>24</sup>OCB has not received any reports of jamming of its satellite transmissions.

<sup>25</sup>As we have previously discussed in this report, some of the results of the 2008 telephone survey differed substantially from those of prior surveys. IBB is continuing to analyze these results to understand the causes of these differences.

---

conclusions is uncertain. The contractor's study also does not address or account for other potential variables, including jamming outside of the Havana area or the effect of mobile jammers on AeroMartí broadcasts. In addition, according to OCB officials, Hurricane Ike may have reduced Cuba's jamming capabilities.

In addition, IBB Office of Engineering officials said that they have provided equipment to monitor the quality of Radio and TV Martí's technical reception in Cuba. According to an IBB Office of Engineering official, these systems are not yet operational due to technical problems and other State priorities. Once operational, the equipment will provide IBB (and others, through a public Web site<sup>26</sup>) with access to the Radio and TV Martí signal received in Cuba. IBB will be able to listen to and view OCB broadcasts and analyze when, how often, and to what extent broadcasts are jammed or interfered with. Officials noted that a major limitation of the systems is that they would only provide data on the quality of technical reception in at the location where the equipment is operating.

---

### Radio and TV Martí Broadcasts Face Competition; OCB Could Do More to Address Challenges Posed by Its Competitors in the Cuban Media Environment

OCB's Director emphasized that the competitive media environment in Cuba is a key challenge for OCB in attracting and maintaining an audience for Radio and TV Martí. To identify what Cuban media are reporting and to understand the situation in Cuba, OCB staff monitor Cuban government broadcasts. In addition, IBB and OCB surveys and focus groups provide some information regarding competing stations. Recent IBB-commissioned telephone surveys indicate that Radio and TV Martí broadcasts face competition from Cuban and international broadcasters. For example, about 60 to 70 percent of respondents in the 2006 telephone survey reported listening to three national Cuban radio stations during the past week. IBB and OCB senior officials said that Cuban radio attracts listeners because of its high-quality music programming. The 2006 telephone survey results indicate that Radio Martí and Radio Exterior de España (Spain's foreign radio) have the largest audience among international radio broadcasters to Cuba, with similar past week listenership rates of about 1 percent.

In recent years, over 90 percent of telephone survey respondents said they watched Cuba's national television broadcasts during the past week. IBB

---

<sup>26</sup>IBB's Web site on its remote monitoring systems is <http://monitor.ibb.gov/rms/>.

---

and OCB officials said that the quality of Cuban television programming has recently improved and includes popular U.S. programming (such as *The Sopranos* and *Grey's Anatomy*). Telephone surveys indicate that TV Martí has a smaller audience than other international television broadcasts. For example, about 30 percent of respondents in 2005 and 2006 said they watched CNN during the past week.<sup>27</sup> Telemundo's and Univision's (which are broadcast only on satellite television) past week viewership rates in 2006 were about 3 percent, while TV Martí's was less than 1 percent. According to IBB research, international radio and television broadcasts, including VOA broadcasts to Cuba,<sup>28</sup> are not jammed at all or not as heavily jammed as Radio and TV Martí.

While OCB and IBB have gathered information relating to OCB's competitors, OCB has not compiled comprehensive information regarding the number, nature, and quality of other radio and television programming available to Cuban listeners and viewers. We have previously reported on how assessments of broadcasting competitors can be used in the strategic planning process to improve operations.<sup>29</sup> For example, we reported that the Middle East Broadcasting Networks conducts ongoing assessments of its competitors and uses this information to make adjustments to its programming. IBB officials said that IBB does not have the resources to catalog all of the different types of programming available to Cubans.

---

### BBG Coordinates with Other Agencies Regarding U.S. Policy Toward Cuba, but Coordination of Audience Research Is Minimal

BBG staff are responsible for coordinating with other agencies—such as State and the U.S. Agency for International Development—that are involved in efforts to provide uncensored information to Cuba. However, BBG coordination with other, relevant U.S. agencies regarding audience research is minimal. The 2006 CAFC report recommended the establishment of quarterly meetings of the appropriate U.S. government agencies to coordinate strategy on broadcasting and communications to Cuba. BBG officials reported that they have participated in significant

---

<sup>27</sup>According to IBB surveys, viewership of CNN broadcasts is relatively high because the Cuban government rebroadcasts segments of CNN programming on its television stations.

<sup>28</sup>BBG broadcasts both Radio Martí and VOA-Spanish to Cuba. VOA-Spanish broadcasts a daily radio program to Cuba via shortwave radio, satellite, and the Internet. BBG considers the overlap to be acceptable, given the limited scope of VOA's broadcasting to Cuba (about 1 hour per day).

<sup>29</sup>GAO, *U.S. International Broadcasting: Management of Middle East Broadcasting Service Could Be Improved*, [GAO-06-762](#) (Washington, D.C.: Aug. 4, 2006).

---

coordination activities regarding U.S. policy toward Cuba. For example, BBG's Executive Director reported attending seven high-level interagency meetings on Cuba in 2008. However, such coordination has not consistently occurred on a quarterly basis and does not address operational challenges, such as the lack of audience research data or data on Cuba's jamming capabilities. We found several examples of ways in which additional coordination could have enhanced OCB's understanding of its Cuban audience. For example:

- OCB and the U.S. Agency for International Development and State grantees do not regularly share relevant audience research with each other. For example, State's Bureau of Democracy, Human Rights, and Labor provides a \$700,000 grant to a nongovernmental organization near Miami that also broadcasts radio programming to Cuba 7 days per week. While OCB and the nongovernmental organization have shared some program content and coordinated with some of the same independent journalists in Cuba, OCB was unaware of a significant amount of audience research that it has gathered. For example, the director of this nongovernmental organization reported that in 2007 it made international telephone calls to 35,000 Cubans to obtain information about their media preferences. The director said his organization would be willing to share the audience research with OCB. BBG and IBB officials were unaware of this organization's broadcasting efforts or its audience research activities.
- OCB and USINT conduct separate audience research activities and do not always share relevant research data with one another. For example, USINT recently administered a survey that included data on Radio and TV Marti's audience reach; however, OCB was unaware of these data.

---

### OCB Has Conducted Strategic Planning Exercises, but Lacks an Approved Strategic Plan

Despite several significant changes in OCB's operations, such as additional transmission methods, OCB lacks a formal strategic plan approved by BBG to guide such decision making. Strategic planning, including the development of a strategic plan, is a good management practice for all organizations. A strategic plan serves the purposes of articulating the fundamental mission of an organization and laying out the long-term goals for implementing that mission, including the resources needed to achieve those goals. We have reported that organizations should make management decisions in the context of a strategic plan, with clearly articulated goals and objectives that identify resource issues and internal and external threats, or challenges, that could impede the organization

---

from efficiently and effectively accomplishing its objectives.<sup>30</sup> Additionally, Office of Management and Budget guidance<sup>31</sup> suggests that strategies state the organization's long-term goals and objectives; define approaches or strategies to achieve goals and objectives; and identify the various resources needed and the key factors, risks, or challenges that could significantly affect the achievement of the strategic goals.

A June 2007 State OIG inspection of OCB recommended that OCB prepare a long-term strategic plan, including contingency planning for a time when uncensored broadcasts are allowed in Cuba. This recommendation has not yet been fully implemented. OCB developed a draft strategic plan with assistance from BBG staff and submitted its draft strategic plan to BBG in July 2007. BBG management said the plan that OCB submitted was more of a crisis broadcasting plan than a strategic plan, and asked OCB to resubmit a strategic plan that was not predicated on Fidel Castro's death, but rather laid out a longer-term vision for OCB operations. At the end of 2007, BBG approved and made publicly available its BBG-wide strategic plan for 2008-2013. According to BBG staff, the Board of Governors then directed BBG staff to work with BBG's broadcast entities to ensure that their individual strategic plans were in line with BBG's strategic plan. OCB subsequently resubmitted its strategic plan to IBB for review and approval. IBB management is currently reviewing the plan. In October 2008, an IBB official and a BBG official suggested that it might take an additional 3 to 6 months for the board to review and approve OCB's draft strategic plan. Without a formal, approved strategic plan, BBG and OCB lack an agreed-upon approach to guide such decision making regarding OCB funding and operations.

---

<sup>30</sup>GAO, *Internal Control Management and Evaluation Tool*, [GAO-01-1008G](#) (Washington, D.C.: August 2001).

<sup>31</sup>OMB Circular A-11.

---

## IBB Identified Problems with OCB's Adherence to Journalistic Standards That OCB Has Not Fully Addressed, but IBB's Process Could Be Improved

IBB's annual program review process is the main mechanism used to assess Radio and TV Martí broadcasts' compliance with VOA journalistic standards. IBB's analyses and external reviews of broadcast content frequently identified problems with the broadcasts' adherence to journalistic standards such as balance and objectivity. IBB has consistently made recommendations to OCB to improve its adherence to certain aspects of journalistic standards; however, OCB has not ensured the full implementation of IBB program review recommendations. While this process provides some useful information, we identified several weaknesses in the process.

---

### IBB's Program Review Process Is the Primary Mechanism for Assessing Whether OCB Broadcasts Comply with Journalistic Standards

The Radio Broadcasting to Cuba Act and the TV Broadcasting to Cuba Act require Radio Martí and TV Martí, respectively, to adhere to VOA journalistic standards to ensure that their programming is accurate, objective, and balanced and presents a variety of views. VOA journalistic standards are set out in the VOA Charter<sup>32</sup> and the *VOA Programming Handbook*.

The VOA Charter sets out the following principles:

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

Source: Voice of America Charter.

In addition to the VOA Charter, OCB has its own set of editorial guidelines that establish OCB's policy on radio and television broadcasts to Cuba, and that are intended to assist broadcast personnel in making day-to-day editorial decisions. The editorial guidelines provide guidance on how to ensure balance, proper sourcing, and proper tone in broadcasts. The guidelines also discuss several proscribed actions in broadcasts, such as the insertion of personal opinion, use of broad generalizations, reporting of unsubstantiated information, and incitement to revolt or other violence.

The main mechanism for assessing broadcasts' compliance with journalistic standards is IBB's program review process, which is designed to improve the content and production value of programming and ensure quality control. IBB officials told us that this is intended to be an iterative process for identifying areas for improvement focused on continuous improvement from year to year, with the broadcast entity having primary responsibility for making such improvements. IBB's Office of Performance Review is responsible for managing the program review process. It conducts annual reviews of VOA's 45 language services and OCB's Radio

---

<sup>32</sup>Pub. L. Nos. 94-350 and 103-415.

---

and TV Martí broadcasts. Office of Performance Review program analysts and external reviewers<sup>33</sup> assess the content and production quality against a standard set of criteria.<sup>34</sup> IBB program analysts write reviews assessing broadcast content and production quality. IBB program review coordinators and OCB management then discuss these inputs at a program review meeting at OCB. Within 2 weeks after the program review meeting, IBB's Office of Performance Review staff directs the formulation of an action plan with suggestions and recommendations for improvement for OCB. The action items are intended to be the result of consensus between IBB and OCB. There is a 3-month follow-up period after the program review meeting during which IBB Office of Performance Review program analysts monitor OCB's implementation of the action plan. IBB and OCB then hold a follow-up meeting to discuss OCB's implementation of the action plan. IBB also assigns performance scores (on a scale of 0 to 4) for each of the individual content and production criterion.<sup>35</sup> The scores from IBB's content and production reviews are then combined with the scores assigned by external experts and monitoring panels of people from the target audience to develop an overall performance score.<sup>36</sup>

---

### IBB's Annual Reviews Identified Problems with Broadcasts' Adherence to Certain Journalistic Standards

While IBB officials report that the quality of OCB programming has improved in recent years, IBB's internal as well as external reviews identified problems with OCB broadcasts' adherence to certain journalistic standards, particularly in the area of balance and objectivity. IBB program analysts' reviews from 2003 through 2008 repeatedly cite several, specific problems with the broadcasts, such as the presentation of

---

<sup>33</sup>External reviewers include audience research monitoring panels consisting of a number of regular listeners or viewers as well as control listeners. Control listeners are language-qualified and are knowledgeable about target country politics and culture, but are usually located in the United States or other Western countries not affected by politics on the ground.

<sup>34</sup>Content criteria include accuracy, timeliness, balance and objectivity, relevance to audience, quality of stringer reports, quality of analysis and interviews, and other broadcast requirements. Production criteria include pace and liveliness, delivery of announcers, presentation style, sound quality, length of individual items, and other broadcast requirements.

<sup>35</sup>While the scoring scale technically ranges from 0 to 4, the IBB program analyst who conducts the content reviews of Radio and TV Martí told us that, in assigning the score for a broadcaster, she starts with a score of 3.5. The score is then lowered if the broadcaster fails to comply with journalistic standards.

<sup>36</sup>Total scores are weighted to assign a greater value to broadcast content and external evaluations than to broadcast production and IBB analysis.

---

individual views as news, editorializing, and the use of inappropriate guests whose viewpoints represented a narrow segment of opinion. IBB reviews of Radio and TV Martí's content identified other problems, including

- placement of unsubstantiated reports coming from Cuba with news stories that had been verified by at least two reputable sources;
- the use of offensive and incendiary language in broadcasts, which is explicitly prohibited by OCB's editorial guidelines; and
- a lack of timeliness in news and current affairs reporting.

External reviews of Radio and TV Martí's broadcast content also identified problems regarding the broadcast's adherence to certain journalistic standards, particularly balance and objectivity. For example, the results of IBB monitoring panels from 2003 through 2007 showed that the majority (9 of 13) of expert control listeners and viewers, as well as approximately one-third (16 of 49) of recent Cuban arrival panelists, expressed concerns about the broadcasts' balance and objectivity. In addition, an OCB-commissioned survey of recent Cuban arrivals in 2007 showed that 38 percent felt that TV Martí programming was "objective," and 13 percent felt the programming was "biased." Furthermore, 29 percent of respondents believed that Radio Martí's news was "objective," and 18 percent felt the news broadcasts were "exaggerated."

To help improve adherence to journalistic standards, in 2007, the Director of OCB issued a memorandum to managers requiring them to certify that they have provided employees and contractors with a copy of both OCB's editorial guidelines and the VOA Charter. OCB has also taken recent steps to improve training for OCB employees that could, over time, address concerns regarding adherence to journalistic standards. For example, OCB has selected a staff person to serve as a training coordinator and established a designated space for training classes. However, BBG's *Manual of Administration* establishes additional responsibilities for providing training that OCB has not yet fulfilled. For example, while the manual requires managers to review employees' training needs annually, OCB officials reported that they have made no recent efforts to identify staff training needs. Although there has been recent training related to writing for the Internet, over the past 5 years, OCB has provided little training to its broadcasting staff on how to comply with journalistic standards. OCB management has acknowledged the importance of training



---

staff, but stated that budget limitations in recent years have precluded such training.

---

## OCB Has Not Ensured Implementation of Some Program Review Recommendations

Action plans that IBB program review coordinators and OCB management have developed consistently recommended that OCB address problems regarding its adherence to certain journalistic standards; however, OCB has not ensured the implementation of some IBB program review recommendations. For example, IBB action plans from 2003 through 2008 recommended that OCB

- separate news from opinion in broadcasts,
- ensure balanced and comprehensive selection of viewpoints,
- avoid sweeping generalizations and editorializing,
- use guests who are informed on program topics, and
- separate unsubstantiated reports from Cuba from newscasts.

Senior officials in IBB's Office of Performance Review said that OCB management is to decide how to handle the recommendations, and noted that the current OCB management has been more responsive to IBB program review recommendations than previous OCB management. In response to a recommendation by the State OIG regarding the lack of implementation of some program review recommendations, BBG agreed to develop a process to help ensure additional oversight of the implementation of such recommendations. Specifically, BBG agreed that the Office of Performance Review should make quarterly reports to the Deputy Director of IBB regarding the most significant outstanding action items.

OCB senior managers acknowledged that IBB's action plans make some of the same recommendations from year to year, and that OCB has not implemented all of the IBB recommendations. For example, OCB senior officials acknowledged that, on occasion, newscasters insert their opinions into newscasts, but said that this is difficult to prevent during live newscasts. We observed that, in cases in which OCB management agreed with IBB program review recommendations, OCB attempted to address specific examples of noncompliance cited in IBB's report, but did not address the broader factors underlying its lack of adherence to journalistic standards. An OCB senior official also said that OCB does not implement

---

certain program review recommendations when it disagrees with IBB over the substance of the criticism.<sup>37</sup>

---

### IBB's Reviews Provide Useful Information, but Have Several Weaknesses

We observed the meetings held between IBB and OCB officials to discuss the results of IBB's reviews of Radio and TV Martí in June and September 2008, and found that this process provides useful information for OCB regarding the content and production quality of its broadcasts. For example, we observed that during the September 2008 Radio Martí program review meeting, IBB analysts provided several specific examples of poor sound quality, editorializing, and long monologues, each of which OCB management agreed to address with relevant staff. We also found that IBB program analysts present constructive recommendations for improvement in these and other areas. However, our analysis of 5 years worth of IBB's qualitative reviews of Radio and TV Martí's content<sup>38</sup> identified several weaknesses in the reviews:

- IBB content reviews of Radio and TV Martí did not clearly indicate whether the broadcasts are in full compliance with journalistic standards or the extent of compliance. These reviews frequently identified problems with the broadcasts' adherence to certain journalistic standards, but did not attempt to indicate the severity or frequency of an identified problem with the broadcasts. When discussing a particular journalistic standard, IBB reviews sometimes cited both positive and negative examples, making it difficult to determine the reviews' overall assessment. We also noted many instances in which the reviews did not make any overall conclusion regarding the broadcasts' adherence to a particular journalistic standard.
- IBB's qualitative reviews of the broadcasts' content sometimes did not clearly support the quantitative score that IBB's analysts assigned to the broadcasts for a particular journalistic standard. In some cases, IBB's content review criticized OCB adherence to a particular journalistic standard, but provided a relatively positive quantitative score. For

---

<sup>37</sup>BBG staff said that the Board of Governors only occasionally gets involved in the program reviews of individual broadcast entities and, when they do so, follows up on specific issues relating to the entities' broadcast content, particularly if there is a complaint. In certain cases, BBG will hire independent reviewers to assess broadcast content.

<sup>38</sup>As we previously discussed, IBB also assigns quantitative performance scores to the content and production quality of the broadcast. However, according to IBB officials, the qualitative assessments are intended to complement (but not necessarily support) the quantitative scores. Furthermore, IBB officials told us that these scores are not comparable across years.

---

example, in a recent IBB review of TV Martí's content, the review cited one negative observation regarding the broadcast's relevance to the audience; however, the reviewer assigned TV Martí with a high score under the "relevance to audience" content criterion. In other cases, IBB's content reviews contained both positive and negative observations, but provided a relatively negative score.

- IBB's content reviews lack consistency in the ways that they are conducted and reported. For example, while the qualitative reviews state the general time period of the review, they did not specify the number of hours that the reviewer spent listening to or viewing programming or clearly indicate the programs that were listened to or viewed. Moreover, the time period varied greatly from about 1 week to 1 year. The lack of consistency in the reviews from year to year makes it difficult to systematically assess Radio and TV Martí's content and production quality across years. BBG officials stated that the reviews are not intended for systematic comparison across years, but to evaluate program quality at a particular point in time, based on a subjectively selected sample of programming chosen by the program analyst.

While IBB's Office of Performance Review has guidance describing the purpose and steps in the program review process, there is no specific operational guidance for analysts explaining how to conduct content and production reviews. For example, IBB does not provide analysts with any guidance to help them determine how to assign a specific quantitative score on the basis of their observations of programming. BBG and IBB officials said they refer IBB analysts to the BBG's strategic plan and OCB's editorial guidelines for guidance. Moreover, while program analysts receive training regarding language, regional expertise, and technical production, they have received limited training regarding skills, such as program evaluation, to assist them in conducting program reviews. The Director of IBB's Office of Performance Review said that program analysts could benefit from additional training in these areas to further enhance the quality of program reviews, but the IBB training budget is limited and priority is given to broadcasters.

---

## Steps Taken to Ensure U.S. Broadcasting to Cuba Adheres to Domestic and International Broadcasting Standards, but Some Concerns Remain

U.S. law generally prohibits the domestic dissemination of public diplomacy information intended for foreign audiences. Some domestic dissemination of OCB programming is authorized by law, and IBB and OCB have taken a variety of steps to minimize U.S. audiences' access to such material. However, both Radio and TV Martí broadcasts reach U.S. audiences in several ways. In addition, some commercials shown by a Miami television station contracted to air TV Martí programming were not consistent with IBB guidance. Furthermore, the Cuban government has complained that U.S. broadcasting to Cuba violates international broadcasting standards, and the international body that serves as a forum for such disputes—the ITU—has found that U.S. television broadcasts (but not radio broadcasts) cause harmful interference with Cuban broadcasts. State indicated that no action has been taken in response to the ITU's determinations that U.S. broadcasts cause harmful interference. Officials from State indicated that the ITU's determinations were based on information provided solely by the Cuban government and that the United States has not independently verified that the broadcasting is causing harmful interference.

---

## OCB Takes Steps to Adhere to Legal Ban on the Domestic Distribution of Public Diplomacy Material, but Some Permitted Domestic Dissemination Occurs

Since 1948, U.S. law has prohibited the domestic dissemination of public diplomacy material intended for foreign audiences.<sup>39</sup> In enacting the legislation, Congress intended, among other things, to prevent the U.S. government from engaging in domestic propaganda. However, legislation authorizing U.S. radio and television broadcasting to Cuba permits domestic dissemination of such broadcasts under certain circumstances. The Radio Broadcasting to Cuba Act<sup>40</sup> directs that radio broadcasting to Cuba utilize broadcasting facilities located in Marathon, Florida, and the 1180 AM frequency, which is available to U.S. listeners. Moreover, if the broadcasts on the 1180 AM frequency are jammed by the Cuban government, the Radio Broadcasting to Cuba Act authorizes the leasing of time on other commercial or noncommercial educational AM band radio stations. Since these broadcasts originate from U.S. territory, they would be available to a domestic audience. The Television Broadcasting to Cuba Act<sup>41</sup> permits some domestic dissemination of U.S. government

---

<sup>39</sup>22 U.S.C. § 1461. Originally enacted as Section 501 of the U.S. Information and Educational Exchange Act of 1948, this law is commonly known as the Smith-Mundt Act.

<sup>40</sup>Pub. L. No. 98-111, § 3, at 22 U.S.C. 1465a.

<sup>41</sup>Pub. L. No. 101-246, § 234, at 22 U.S.C. 1466bb(a).

---

information prepared for dissemination abroad, as long as the dissemination is “inadvertent.” While the term “inadvertent” is not defined, the statute’s legislative history indicates that under certain circumstances, some domestic reception would be unavoidable and, therefore, permitted, as long as transmission signals would not be intentionally or deliberately targeted to domestic audiences.

OCB has taken a variety of steps to minimize the domestic dissemination of U.S. broadcasting to Cuba. For example, the three radio antennas used for OCB’s radio broadcasting on the 1180 AM frequency from Marathon are arrayed in a line so that the signal is directed toward Cuba and away from the United States. In addition, in deciding which local Miami television station to contract with to place TV Martí programming on DirecTV, IBB officials told us that they evaluated the geographic coverage of each station’s broadcasting, with a view toward minimizing domestic dissemination.

Despite efforts to minimize domestic dissemination, U.S. broadcasting to Cuba can be accessed domestically through several means. Both the shortwave and AM radio broadcasts can be heard in parts of Florida. In addition, TV Martí programming on TV Azteca can be seen in Miami by those with local cable or DirecTV subscriptions. Furthermore, streaming video from TV Martí and audio from Radio Martí can be retrieved from OCB’s Web site.

---

### Some Commercials Aired during TV Martí Programming on TV Azteca Were Inconsistent with IBB Practice

BBG lacks a formal, written policy for determining whether commercials aired during or after BBG broadcasts are appropriate. However, IBB’s standard practice is to include standard language relating to the inclusion of advertisements during BBG (TV Martí, in this case) broadcasts in their contracts with other broadcasters. That standard language explicitly prohibits “political advertising immediately before, after, or during the BBG provided programming.” Other than political advertisements, no other content is explicitly prohibited.

In December 2006, IBB contracted with a Miami-based television station, TV Azteca, to broadcast two nightly TV Martí newscasts. The contract provided TV Martí with two 26-minute windows of airtime that would be broadcast locally in Miami and be viewable in Cuba to those who subscribe to DirecTV and purchase the local Miami programming package. The remaining 4 minutes of the half hour are used by TV Azteca to air commercials. The following concerns have been raised regarding these commercials:

- 
- First, some critics believe that the mere existence of these commercials is inappropriate. They believe that, as a U.S. government-funded broadcast, there should be no advertisements for commercial products or services. However, we found, consistent with BBG’s legal assessment, that no U.S. law, regulation, or BBG policy or practice prohibits the airing of advertisements during TV Martí broadcasts.
  - Second, some OCB employees complained that the content of some commercials shown during the TV Martí programming is inappropriate. For example, they reported viewing political advertisements and commercials for a 1-900 phone sex service during TV Martí programming on TV Azteca. We subsequently confirmed that advertisements for a U.S. presidential candidate aired in September 2008. We also viewed an advertisement for a “Love Calculator,” which aired in April 2008.

The contract with TV Azteca did not include the standard language prohibiting political advertising during TV Martí broadcasts. A BBG official suggested that this error could have occurred as a result of staff turnover in the final phase of the negotiation and drafting of the contract. As we have previously reported,<sup>42</sup> this contract was awarded with limited involvement of contracting officials. According to BBG, OCB requested, in October 2008, that TV Azteca air the TV Martí broadcasts for 26 consecutive minutes and that any advertisements be shown after the TV Martí programming. BBG’s Acting General Counsel indicated that the contract would be modified to reflect this change.

After informing BBG staff of our findings related to the content of some commercials aired during TV Martí programming on TV Azteca, BBG officials acknowledged that the airing of political advertisements is inappropriate. In October 2008, BBG requested that TV Azteca stop airing political advertisements during TV Martí programming. In response, TV Azteca agreed to cease airing political advertisements during TV Martí programming.

---

<sup>42</sup>[GAO-08-764](#).

---

## International Body Finds That Some U.S. Broadcasting to Cuba Violates International Broadcasting Regulations

According to State records, since 2003, the Cuban government has filed more than 300 specific complaints that U.S. broadcasting to Cuba violates international broadcasting regulations.<sup>43</sup> The ITU, which is the leading United Nations organization for information and communication technologies, develops these regulations.<sup>44</sup> The Cuban government has consistently objected to U.S. television broadcasts to Cuba. The FCC has authorized OCB to broadcast on television channels 13 and 20. Cuba alleges that this U.S. broadcasting causes harmful interference to its own broadcasting on television channels 13 and 20, which it has registered with the ITU. In 2004 and 2006, the ITU determined that U.S. broadcasting on channels 13 and 20, respectively, was causing harmful interference and encouraged the United States and Cuba to cooperate and find a solution for solving the harmful interference.

State indicated that no action has been taken in response to the ITU's determinations that U.S. broadcasts cause harmful interference. Officials from State indicated that the ITU's determinations were based on information provided solely by the Cuban government, and that the United States has not independently verified that the broadcasting is causing harmful interference. The Cuban government also has complained to the ITU about U.S. radio broadcasts to Cuba. Recently, Cuba has filed complaints regarding U.S. broadcasting on the 530 AM frequency. However, the ITU determined in December 2004 that since Cuba has not registered a station on that AM frequency, it cannot complain about harmful interference on that frequency.

The Cuban government has further argued that U.S. broadcasting from an airborne platform violates ITU regulations. Following Cuban complaints, at the ITU World Radiocommunication Conference in November 2007, a report was adopted that stated that broadcasting from an aircraft for the purpose of transmitting solely to the territory of another country without

---

<sup>43</sup>According to State, over the past 25 years, the U.S. government has also complained frequently (over 50 complaints of 50 incidents each since 2003) regarding harmful interference to U.S. broadcasts caused by Cuban jamming signals.

<sup>44</sup>The ITU is mandated by its constitution to allocate spectrum and register frequency assignments to avoid harmful interference between radio stations of different countries. The international spectrum management system, therefore, is based on regulatory procedures for frequency notification, coordination, and registration. The ITU serves as a forum for complaints between countries regarding international broadcasting, but, according to U.S. officials, has little investigatory power and no formal adjudicative or enforcement authority.

---

its permission was not in conformity with ITU regulations. The U.S. government disassociated from that statement in the report as not accurately representing the ITU Radio Regulations and reiterated its policy of broadcasting information to the Cuban people.

---

## Despite Some BBG and OCB Efforts, Oversight and Management Challenges Persist

Several groups, including BBG, IBB, and the State OIG, provide oversight of OCB operations. Oversight efforts by these various groups have identified three categories of concerns in recent years: poor communication by OCB management, low employee morale, and allegations of fraud and abuse. In responding to recent audit reports, BBG and OCB have taken steps to address nearly all of the audit recommendations.

---

## Several Groups Perform Oversight of OCB

Several groups perform oversight of OCB operations. BBG and its staff perform oversight in multiple ways. BBG holds a monthly meeting at which the head of each broadcast entity (including the Director of OCB) updates the BBG Governors on the key efforts of their entity. BBG also conducts a statutorily mandated annual review of the effectiveness of its broadcasts. According to BBG staff, this process (called Language Service Review) is a comparative review designed to evaluate the need for adding or deleting language services and strategically allocating funds to the language services on the basis of priority and impact. To facilitate this process, BBG staff prepare summary data and narrative for each language service, covering such issues as audience reach, budget, and program quality rating. BBG staff also oversee OCB through unscheduled but regular communication on various issues, such as budget and finances.

IBB's efforts to oversee OCB take three main forms. First, OCB participates in a daily editorial meeting with VOA and IBB staff to discuss what news stories each entity will be covering that day. According to IBB's Deputy Director, participation in such meetings can help coordinate entities' coverage of stories and ensure that each entity is covering all of the relevant news events. Second, as we have previously discussed, IBB performs annual program reviews of Radio and TV Martí. According to IBB's Deputy Director, the program review process is intended to provide quality control by objectively evaluating OCB's broadcasting services once a year and recommending improvements in their broadcasting. Third, IBB participates in and oversees OCB's handling of strategic issues, such as using an aircraft to broadcast TV Martí programming.



---

The State OIG has performed three reviews of OCB since 1999. These reviews have covered a variety of issues—including strategic planning, security, audience research, and contracting—and have resulted in multiple recommendations for improvement. In addition to the inspections and audits focused on OCB operations, the State OIG has also conducted reviews of BBG and IBB operations that affect OCB. For example, in May 2006, the State OIG issued a report related to IBB’s Office of Performance Review, which conducts the annual program review process for OCB and VOA.<sup>45</sup> In addition, in July 2007, the State OIG released the results of its inspection of USINT, which sometimes assists U.S. broadcasting to Cuba.<sup>46</sup>

In addition, OCB employees have multiple outlets to raise concerns regarding management and personnel issues. OCB employees can seek assistance from their employee union<sup>47</sup> to address concerns regarding working conditions. The union has two stewards who work at OCB headquarters in Miami. OCB employees can also raise concerns about equal employment opportunity issues with IBB’s Office of Civil Rights. Two OCB employees serve as liaisons between OCB employees and the Office of Civil Rights by receiving and working to address employee concerns. IBB’s Office of Human Resources also has a full-time staff person at OCB who, in addition to other administrative responsibilities, receives employee complaints regarding mismanagement.

BBG, IBB, and OCB staffs have mixed views regarding whether OCB’s location in Miami inhibits effective oversight of OCB operations. BBG and IBB management reported that OCB’s location does not inhibit their efforts to oversee it. They noted that they are in regular contact with OCB management by telephone and e-mail. They also noted that the monthly BBG board meetings (one of which is held in Miami each year) provide sufficient personal contact with OCB management. Some OCB employees, however, expressed concern regarding what they perceive as a lack of oversight or involvement by BBG and IBB. One employee commented that OCB seemed to be “out of sight and out of the minds” of BBG and IBB. Other OCB employees suggested that more regular visits by BBG or IBB

---

<sup>45</sup>Department of State, OIG, *Report of Inspection: The International Broadcasting Bureau’s Office of Performance Review*, ISP-IB-06-37 (Washington, D.C.: May 2006).

<sup>46</sup>Department of State, OIG, *Report of Inspection: U.S. Interests Section, Havana, Cuba*, ISP-I-07-27A (Washington, D.C.: July 2007).

<sup>47</sup>OCB employees are represented by the American Federation of Government Employees.

---

staff to OCB would enhance their understanding of OCB's operations and management.

---

### Oversight Efforts Have Raised Concerns Regarding Communication, Morale, and Fraud and Abuse

In recent years, three categories of problems have been raised regularly regarding OCB operations. First, some OCB employees reported poor communication from senior OCB management. Prior GAO work has shown the benefits of maintaining continuous dialogue between management and employees to share information and address workplace issues.<sup>48</sup> However, in responding to the Office of Personnel Management's 2007 annual employee survey, more than half of OCB employees responding disagreed or strongly disagreed with the statement that they are satisfied with the information they received from management on what is going on in the organization.<sup>49</sup> Several OCB employees expressed concern to us specifically regarding the lack of any formal systems for disseminating information from management to staff or for staff to provide input into management decisions. They expressed frustration with the lack of regular staff meetings and absence of an employee newsletter to improve communication. However, despite an informal recommendation from the State OIG, OCB management has not established any formal or regular mechanisms for communicating with staff, such as regular staff meetings or newsletters. In response, OCB senior management noted that there are frequent meetings between the OCB Director and senior managers to discuss various issues, but that it is the responsibility of managers to brief their staff on current issues and hold regular staff meetings.

Second, employee morale has been a concern at OCB. For example, a majority of OCB employees responding to the Office of Personnel Management's 2007 annual employee survey either disagreed or strongly disagreed with the statement that they are satisfied with their involvement

---

<sup>48</sup>GAO, *Human Capital: Practices That Empowered and Involved Employees*, GAO-01-1070 (Washington, D.C.: Sept. 14, 2001).

<sup>49</sup>Another 27 percent of respondents neither agreed nor disagreed, and 20 percent of respondents indicated they agreed or strongly agreed. According to BBG officials, these results were similar to those of other BBG employees.

---

in decisions that affect their work.<sup>50</sup> Our interviews with some employees in Miami also confirmed that employee morale is a concern.

Relating to the issue of employee morale, BBG management and OCB employees expressed differing views regarding the current director's management of OCB. BBG and IBB management praised his leadership style and told us that he has made numerous improvements in OCB's organization and broadcast quality. In 2007, the State OIG praised the director as a "hands-on manager and an assertive, inspiring leader."<sup>51</sup> At the same time, the State OIG acknowledged that his management style has intimidated some employees. Similarly, we spoke with some OCB employees who view him as a "micromanager" with excessive involvement in the editorial content of OCB programming.

Third, a variety of allegations regarding fraud and abuse have been raised. For example, according to BBG officials, they referred one case of suspected fraud to the State OIG. As a result, in 2007, an OCB employee was sentenced to serve 27 months in prison and required to pay a monetary fine for taking kickbacks from a production company doing business with OCB. Other allegations, however, have not been substantiated. From November 2007 through May 2008, our Office of Forensic Audits and Special Investigations interviewed former and current employees alleging mismanagement at OCB. Employee allegations included, among other things, time and attendance abuse, improper hiring practices, contracting improprieties, and excessive travel by OCB managers. Our investigators requested documentation from employees that would support their allegations. Although investigators received some documentation, it was insufficient to pursue further investigation. Therefore, while investigators found some indications of mismanagement, much of the evidence was anecdotal or hearsay and did not provide a sufficient basis to continue the investigation.

Data from BBG's Office of Civil Rights show that the number of complaints that OCB employees have filed recently averages fewer than 3 per year. Staff from the Office of Civil Rights suggested that this

---

<sup>50</sup>Another 20 percent of respondents neither agreed nor disagreed, and 26 percent of respondents indicated that they agreed or strongly agreed. According to BBG officials, these results were similar to those of other BBG employees.

<sup>51</sup>Department of State, OIG, *Report of Inspection: Office of Cuba Broadcasting*, ISP-IB-07-35 (Washington, D.C.: June 2007).

---

represents an improvement from previous time periods when a larger number of complaints were filed, and attributed this improvement to the management style of the current OCB Director. Since 2003, the Office of Civil Rights has received 15 formal complaints from OCB employees. The most frequently cited reasons for complaints were reprisal and discrimination on the basis of gender or national origin. According to the Director of the Office of Civil Rights, a few cases were settled and managers prevailed in the remainder of the 12 cases that have been completed. In placing these most recent complaints in context, staff from the Office of Civil Rights indicated the following:

- A small number of OCB employees accounts for a majority of the complaints. Since 2003, 4 employees have been responsible for 9 of the 15 complaints filed by OCB employees.
- The number of equal employment opportunity complaints filed by OCB employees was substantially higher during the tenure of other OCB Directors.
- In their experience, other BBG broadcast entities have more frequent equal employment opportunity complaints than OCB.

However, some OCB employees told us that the current outlets for expressing concerns are ineffective. For example, an OCB employee union representative indicated that in numerous cases, OCB management has ignored or insufficiently addressed union members' concerns. In addition, some employees expressed fear of reprisal by managers if they raise concerns.

---

## BBG and OCB Have Taken Steps to Address Nearly All Recent Audit Recommendations

As we have previously discussed, external auditors have conducted several reviews in recent years related to U.S. broadcasting to Cuba. Those reviews have led to numerous recommendations for improvement to BBG, IBB, and OCB. Most notably, in its 2003 and 2007 inspection reports of OCB, the State OIG made 20 formal recommendations to improve OCB operations. These recommendations addressed a variety of issues related to OCB operations, including audience research, contracting, adherence to journalistic standards, and strategic planning. Of those, the State OIG considers 17 of the recommendations to be implemented. OCB officials indicated that other recommendations related to physical security at OCB headquarters will also be addressed soon.

---

IBB staff are responsible for tracking the status of ongoing and completed audits related to all BBG entities and providing monthly reports to ensure that IBB management and BBG staff are aware of such ongoing activities. According to BBG officials, this is performed mainly to ensure that BBG staff are aware of auditors' ongoing inquiries. IBB staff maintain a paper file for each audit, and, if a report is published and contains recommendations, the file would maintain the report and any follow-up documentation related to compliance. BBG officials stated that they are developing a database that can be used to easily access information regarding the compliance status of various audit recommendations. Once this is completed, the database will contain information that can be used by BBG staff and the Board of Governors to perform their oversight responsibilities.

---

## Conclusions

Broadcasting to Cuba has been an important part of U.S. foreign policy toward Cuba for more than two decades. Despite OCB's recent efforts to broadcast Radio and TV Martí using additional transmission methods at a significant cost, the best available research indicates that OCB's audience size is small. However, OCB believes that these results do not reflect the true size of its audience in Cuba, citing the challenges to conducting valid audience research in Cuba and anecdotal reports it receives from Cubans. With a new President and Congress, the United States has a fresh opportunity to reassess the purpose and effectiveness of U.S. radio and television broadcasting to Cuba. To assist decisionmakers in formulating the U.S. broadcasting strategy and making funding decisions, BBG and OCB need to ensure that they have articulated a clear strategy and assembled data to help decisionmakers assess the effectiveness and return on investment of OCB's various transmission methods.

In addition to the need for a clear strategy to guide current and future policy direction, which OCB and BBG are developing, it is important to have systems and processes in place to enable the efficient and effective operation of OCB. To help ensure that U.S. broadcasting to Cuba is informed by all available audience research, it is important to enhance coordination among U.S. agencies and grantees that perform such research. Additionally, to better ensure that U.S. broadcasting to Cuba is in compliance with journalistic standards, the lack of training for OCB staff needs to be addressed and guidance and training for IBB program analysts who conduct reviews of OCB's adherence to journalistic standards should be enhanced. Furthermore, to improve morale within the organization, OCB management should take steps to address persistent concerns with its communication and interaction with OCB staff. Finally, to avoid the

---

diminution of the reputation of U.S. government-funded broadcasting, it is important that advertisements containing inappropriate material are not shown during OCB broadcasts.

---

## Recommendations for Executive Action

To assist decisionmakers and improve OCB's strategy, we recommend that the Broadcasting Board of Governors take the following two steps:

- Conduct an analysis of the relative success and return on investment of broadcasting to Cuba, showing the cost, nature of the audience, and challenges—such as jamming and competition—related to each of OCB's transmission methods. The analysis should also include comprehensive information regarding the media environment in Cuba to better understand the extent to which OCB broadcasts are attractive to Cubans.
- Coordinate the sharing of information among U.S. agencies and grantees regarding audience research relating to Radio and TV Martí.

To improve OCB operations, we recommend that Broadcasting Board of Governors take the following four actions:

- Direct IBB to enhance guidance and training for analysts performing program reviews.
- Direct OCB to provide training to OCB staff regarding journalistic standards.
- Direct IBB to develop guidance and take steps to ensure that political and other inappropriate advertisements are not shown during OCB broadcasts.
- Direct OCB to establish formal mechanisms for disseminating information to and obtaining views from employees to help improve communication and morale.

---

## Agency Comments and Our Evaluation

We provided a draft of this report to the Broadcasting Board of Governors and the Department of State. Their technical comments are included in this report as appropriate. In addition, BBG provided formal comments, which are reprinted in appendix II.

BBG indicated that it is in general agreement with all of the recommendations and will move to implement them, to the degree practicable. BBG also suggested that the draft report at times did not fully

---

reflect the difficulties in broadcasting to a closed society or in evaluating the reach of broadcasts to a closed society. We believe the report addresses both issues appropriately. Regarding the difficulties in broadcasting to a closed society, the report has separate sections (in which BBG, IBB, and OCB officials are frequently cited) that discuss the challenges posed by Cuban government jamming and competitors in the Cuban media environment. Regarding the difficulties in evaluating the reach of broadcasts to Cuba, the report clearly acknowledges that significant challenges exist to conducting valid audience research in Cuba. For example, the report discusses the prohibition on conducting in-person audience research in Cuba and the lack of nationally representative data from telephone surveys. BBG also suggested that the draft report's discussion of a lack of a strategic plan was somewhat misleading. While the report acknowledges coordination has occurred on some strategic issues, OCB's draft strategic plan (which was first presented in July 2007) has yet to be approved. We believe an approved strategic plan would be particularly valuable to decisionmakers as the new Congress and Administration seeks to formulate the U.S. broadcasting strategy and make funding decisions.


---

As agreed with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies of this report to interested congressional committees, the Secretary of State, and the Broadcasting Board of Governors. In addition, this report will be available at no charge on the GAO Web site at <http://www.gao.gov>.

---

If you or your staff have any questions about this report, please contact me at (202) 512-4128 or [FordJ@gao.gov](mailto:FordJ@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who contributed to this report are listed in appendix III.

Sincerely yours,

A handwritten signature in black ink that reads "Jess Ford". The signature is written in a cursive style with a large, looping initial "J" and a distinct "F".

Jess Ford  
Director, International Affairs and Trade



---

# Appendix I: Scope and Methodology

---

To examine the Office of Cuba Broadcasting's (OCB) approach for broadcasting to Cuba and what is known about the size of its audience, we reviewed and analyzed strategic, programmatic, budget, and audience research documents from the Broadcasting Board of Governors (BBG), International Broadcasting Bureau (IBB), OCB, and Department of State (State). To describe OCB's approach, we reviewed BBG's strategic plan for 2008-2013 and OCB's draft strategic plan and interviewed officials at BBG, IBB, and OCB regarding strategic planning exercises. To analyze OCB's approach for broadcasting to Cuba, we reviewed relevant documentation—including OCB and IBB data on the cost, broadcast schedule, geographic coverage, and effectiveness of Radio and TV Martí's various transmission methods—and interviewed OCB and IBB officials. We also visited some of the sites from where OCB broadcasts Radio and TV Martí, including OCB's medium-wave radio station in Marathon, Florida, and AeroMartí's station in Key West, Florida, and interviewed OCB staff and contractors based at those locations. To describe the makeup of OCB's budget, we obtained OCB data regarding its fiscal year 2008 budget. We determined that these data were sufficiently reliable for the purpose of identifying the main categories and general budget levels for each category. To identify the available information regarding the size of OCB's audience, we analyzed IBB and OCB audience research from 2003 through 2008, including telephone surveys, focus group studies, and anecdotal reports of reception. To assess the reliability of these data, we interviewed BBG, IBB, and OCB officials, as well as IBB and OCB audience research contractors, regarding the methodology for collecting the data. We also observed an OCB-commissioned monitoring panel and a Radio Martí program review meeting with IBB and OCB officials to review and analyze the results of audience research. In addition, we analyzed IBB documents explaining the methodology for conducting various audience research efforts. We determined that these data were sufficiently reliable for the purpose of characterizing the size of Radio and TV Martí's audience in very broad terms for the populations the surveys reached. However, the fall in reported audience size in the 2008 IBB telephone survey does raise some questions about the accuracy of that survey. To analyze the impact of Cuban government jamming on OCB's broadcasts, we reviewed OCB documents—including an assessment of Cuban jamming capabilities and a study conducted by AeroMartí's primary contractor on the airplane's capabilities—and interviewed IBB and OCB engineers and AeroMartí's contractor. To analyze the effect of competition on OCB broadcasts, we reviewed IBB telephone surveys and interviewed OCB and IBB officials. To assess the extent of interagency coordination, we reviewed relevant documentation, including the Commission for Assistance to a Free Cuba

reports, and interviewed BBG, OCB, U.S. Agency for International Development, and State officials.

To review how BBG and OCB ensure compliance with journalistic principles, we reviewed documentation on journalistic standards, including Voice of America's (VOA) Charter and OCB's editorial guidelines, as well as IBB's qualitative and quantitative assessments of Radio and TV Martí's broadcast content. To understand IBB's process for assessing OCB broadcast content, we observed a June 2008 TV Martí follow-up meeting and a September 2008 Radio Martí program review meeting and interviewed BBG, IBB, and OCB officials. To assess OCB compliance with journalistic standards, we analyzed IBB program review documentation from 2003 to 2008, including IBB's qualitative reviews of OCB's broadcast content, IBB's content and production performance scores for OCB and VOA broadcasts, and IBB actions plans. We also interviewed IBB officials responsible for overseeing the performance review process and the IBB program analyst who performed the reviews of Radio and TV Martí. To assess the quality of IBB reviews of OCB broadcast content, we systematically analyzed IBB reviews of Radio and TV Martí broadcast content from 2003 to 2008. For each review, we determined whether and to what extent the review report identified information, such as the scope of the review, overall judgments regarding compliance with journalistic standards, and the frequency or severity of problems cited. In addition, we reviewed the results of prior audit work regarding the program review process. To identify the amount of training on journalistic standards offered to OCB employees, we reviewed OCB training records and interviewed OCB staff.

To describe the efforts taken to ensure that U.S. broadcasting to Cuba complies with relevant domestic and international broadcasting standards, we reviewed legislation authorizing U.S. radio and television broadcasting to Cuba and legislation prohibiting domestic dissemination of public diplomacy information intended for foreign audiences. We also interviewed BBG officials regarding the steps taken to minimize domestic dissemination of Radio and TV Martí programming. In addition, we interviewed a representative of TV Azteca and obtained documents related to political advertisements and commercials aired during September 2008. Furthermore, we interviewed and obtained video clips from OCB employees regarding commercials aired by TV Azteca during TV Martí broadcasts. We also reviewed documents from the U.S. government, Cuban government, and International Telecommunication Union (ITU) regarding U.S. broadcasting to Cuba's adherence to ITU regulations. Finally, we interviewed officials from State and the Federal

Communications Commission about the history of U.S.-Cuban disputes regarding international broadcasting and the current U.S. position regarding broadcasting to Cuba.

To identify oversight and management challenges related to OCB and analyze the efforts undertaken to address those challenges, we reviewed prior audit reports by GAO and the State Office of Inspector General. We also interviewed BBG staff and reviewed BBG documentation regarding the steps taken to implement prior audit recommendations. Additionally, we analyzed BBG data regarding official complaints by OCB employees since 2003 to describe the nature of the complaints. Furthermore, we interviewed BBG, IBB, and OCB officials regarding oversight and management challenges and the steps taken to address those challenges. Finally, we interviewed OCB staff regarding current and historical management and oversight challenges.

We conducted this performance audit from March 2008 to January 2009, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

# Appendix II: Comments from the Broadcasting Board of Governors



BROADCASTING BOARD OF GOVERNORS  
UNITED STATES OF AMERICA

December 22, 2008

JOAQUIN F. BLAYA

BLANQUITA W. CULLUM

D. JEFFREY HIRSCHBERG

STEVEN J. SIMMONS

THE HONORABLE  
CONDOLEEZZA RICE  
*Secretary of State*  
*Ex Officio*

Mr. Jess T. Ford  
Director  
International Affairs and Trade  
U.S. Government Accountability Office

Dear Mr. Ford:

Thank you for the opportunity to comment on the draft report of the Government Accountability Office (GAO), "Broadcasting to Cuba: Actions Needed to Improve Strategy and Operations." The Broadcasting Board of Governors (BBG) appreciates the GAO's recommendations and note that we are in general agreement with all of them. Accordingly, we will move to implement them, to the degree practicable.

While we are in general agreement with the GAO's recommendations, we believe that, in some cases, the text of the draft report may lead the reader to accept broad conclusions, absent important qualifying information related to the unique environment of broadcasting to Cuba. The draft report at times does not fully reflect the difficulties in broadcasting to a closed society, or in evaluating the reach of broadcasts to a closed society. To both points, we believe that additional context would be helpful. However, GAO's recommendations will in general assist the Agency as it works to improve OCB's broadcast strategy, management operations, and programming. In the paragraphs below, we provide our comments on specific GAO recommendations, and text in the draft report.

**GAO Recommendation: Conduct an analysis of the relative success and return on investment of broadcasting to Cuba showing the cost, nature of the audience, and challenges—such as jamming and competition—related to each of OCB's transmission methods. The analysis should also include comprehensive information regarding the media environment in Cuba to better understand the extent to which OCB broadcasts are attractive to Cubans.**

We accept the recommendation and will begin planning to conduct such analysis, under the auspices of the IBB Research Director. However, it should be noted that there are limitations on the amount of information we can obtain. Since Cuba is a closed society relative to much of our research market, we are not able to

330 INDEPENDENCE AVENUE, SW ROOM 3360 COHEN BUILDING WASHINGTON, DC 20237 (202) 203-4545 FAX (202) 203-4568

conduct our own surveys on the island. (GAO has noted the limitations of the telephone surveys conducted by the Agency, on page 16 of its draft report.) However, working with other agencies and contractors, the BBG will explore new ways of using our phone surveys to assess reception issues, and will more regularly and systematically explore these issues in qualitative projects with recent immigrants (e.g. we plan to expand the surveys we conduct of recent arrivals from Cuba, and other surveys when possible, to include questions on reception related to each of OCB's transmission methods, for both radio and television). As noted in the draft report, the December 2007 survey of 300 recent arrivals showed 45% having listened to Radio Marti, and 21% having viewed TV Marti over the last 6 months, but no indication as to which method of transmission was used by the respondents. Over the next year, we have contracted to conduct two comprehensive surveys of recent arrivals (to be comprised of 300 recent arrivals per survey), and we will work with the contractor to develop appropriate questions to glean additional information on the various transmission methods. For TV Marti, we will inquire as to whether the respondents viewed it via satellite (DirecTV or Hispasat), or via our airborne transmissions on UHF Channel 20, or the new VHF Channel 13. For Radio Marti, we will inquire as to whether they listened on shortwave or AM. We agree that this will provide useful data to gauge the effectiveness of each method, although the results will have to be qualified based on the limitations of the survey.

In order to obtain sufficient information for a thorough analysis, we will require at least one year (two surveys) to obtain a meaningful amount of data. For example, broadcasting on VHF Channel 13 is only now beginning, so the full impact of this important new transmission method may not be seen until the second survey is done later in the year. With regard to the issue of better understanding the media environment in Cuba and program delivery by the most effective means possible, we plan to continue to address these questions in qualitative research with recently-arrived immigrants. While extensive research has already shown both the appeal of some entertainment programming on Cuban radio and television and the strong desire to receive alternative, uncensored news and information of the kind Radio and TV Marti offer, the BBG will continue to investigate the most appealing formats, scheduling, and delivery of OCB's unique, mission-driven programming, taking into account developments in the Cuban media market. Thus, the two comprehensive surveys will include detailed questions on the TV and Radio programming preferences of the participants. In addition, over the next year, the contractor will conduct ten monthly panel reviews (comprised of eight to ten recent Cuban arrivals on each panel) to evaluate current and proposed TV Marti programming to ascertain the programming preferences of the Cuban population. We will ensure that the analysis takes into account the current media environment in Cuba.

**GAO Recommendation: Coordinate the sharing of information among U.S. agencies and grantees regarding audience research relating to Radio and TV Marti.**

We concur with the recommendation. BBG's research staff and its contractor, Intermedia, maintain contact with professionals who do research on Cuba, and regularly review the panorama of available research on Cuba. Intermedia quotes usable and reliable items from both governmental and non-governmental sources in its regular Open Source Center contributions (available to all government agencies), and uses them in its research reports, program reviews, and conversations with BBG's OCB research staff. BBG therefore agrees to continue to coordinate the sharing of research regarding Radio and TV Marti with other Federal agencies and their grantees, as appropriate. Specifically, BBG will continue to have discussions with the State

Department and USAID about any research done relevant to media in Cuba (including applicable research of a State Department non-governmental grantee), and will continue to coordinate the sharing with OCB of any such data and data that might come out of USINT Havana.

**GAO Recommendation: Direct IBB to enhance guidance and training for analysts performing program reviews.**

We concur with the recommendation. As stated in the draft report, analysts already receive a wide range of training, but additional training would be useful: “[W]hile program analysts receive training regarding language, regional expertise, and technical production, they have received limited training regarding skills such as program evaluation to assist them in conducting program reviews.” Accordingly, as directed by the BBG (subject to budget limitations), IBB will establish a training program to further enhance the quality and uniformity of program reviews. IBB will also refine the evaluation process and update the criteria used during program reviews, as applicable. Refinements and updates will be clearly conveyed to all program review analysts.

**GAO Recommendation: Direct OCB to provide training regarding journalistic standards to OCB staff.**

We concur with the recommendation. While OCB staff has taken a variety of journalism classes in various topics over the last few years, OCB plans to provide specific training on journalistic standards for OCB staff annually. It should be noted however, that OCB seeks to hire only trained journalists, ensures that all journalists are conversant with the VOA Charter (which sets out the VOA journalistic standards), and continuously provides on-the-job training as more experienced News and Programs Department managers guide newer employees.

**GAO Recommendation: Direct IBB to develop guidance and take steps to ensure that political and other inappropriate advertisements are not shown during OCB broadcasts.**

We concur with the recommendation. IBB has a standard clause that it includes in its broadcast agreements that prohibits advertisements from being aired except in specifically designated windows. The clause also prohibits any political ads from being aired immediately before or after or during the BBG provided programming. In the current contract with TV Azteca, the programming is aired for a continuous 26-minute block of time during any 30-minute segment on Monday through Friday beginning at 6:00 PM until 7:00 PM and again from 11:30 PM until 2:00 AM, and on Saturday and Sunday beginning at 12:00 AM to 2:00 AM. Because the programming is continuous, there are no specially designated windows to place any advertisements. The language in the contract has been altered to read as follows: “The Source may broadcast its own station announcements before or after OCB programs, but not during OCB programs. The OCB programming shall be run uninterrupted for 26 minutes during each half hour segment. Station announcements shall be limited to commercials and features of local interest and must be clearly distinguished from the OCB and the United States Government and shall be done with the highest degree of integrity and business ethics. Also, there shall be no political advertising immediately before or after the OCB provided programming.” OCB will periodically monitor vendors’ broadcasts to ensure compliance with the relevant contractual provisions.

**GAO Recommendation: Direct OCB to establish formal mechanisms for disseminating information to and obtaining views from employees in order to help improve communication and morale.**

We concur with the recommendation. As noted in the draft report, the OCB Director holds frequent meetings with senior managers whose responsibility it is to brief their staff on current issues. Nevertheless, we agree that steps can be taken to help improve communication and morale. OCB plans to take the following steps: 1) A monthly OCB newsletter will be initiated with input from each department, as a means of providing employees with information on important issues and OCB initiatives; 2) The IBB Office of Human Resources representative at OCB will serve as the point of contact for OCB employees to suggest operational improvements or to provide their viewpoints on any issue of concern (anonymously if they desire). OCB employees will be notified of these new initiatives via memorandum from the OCB Director.

**Additional Comments**

Page three of the draft report contains language on audience research. We appreciate the additional context provided on both page 16 of the draft report outlining the unavoidable limitations associated with telephone surveys and on page 18 in the discussion of other survey results. The various surveys cited in the GAO draft report indicate a wide range of possible audience sizes – from fairly small to fairly large. We note that this further demonstrates the point that GAO makes in some areas of its draft report – that the environment of a closed society such as Cuba’s limits the possibilities for estimating with confidence the size of audiences for foreign media such as Radio and TV Marti. Thus, it is important to consider all information obtained through various survey methods (noting weaknesses associated with each survey method) and obtained from anecdotal reports from the island.

Pages five and 41 of the draft report contain language regarding OCB management. We appreciate the language on page 41 expressing the generally positive view of OCB management and the inclusion of the quote from the OIG’s 2007 report on Inspection of the Office of Cuba Broadcasting (ISP-IB-07-35). However, we believe this language understates the current strength of OCB management and the improvements in management and programming that have been accomplished over the past few years. We concur with the OIG’s finding that:

“Over the past four years, the director is widely credited by officials of BBG, IBB and the Department of State with using his strong leadership and managerial skills to significantly improve OCB operations. The OIG team concurs with this assessment. With the support of the BBG and IBB personnel, the quality of programming has significantly improved. The organization is also more efficient, thanks to a major reorganization that combined Radio and TV Marti’s programming and news operations.”

And:

“Overall, however, the director is viewed as the most effective one in recent history. Most employees credit his leadership for OCB’s leaps forward in its reorganization, technology upgrades, and enhanced broadcast quality.”

While there is room for improvement in areas such as employee morale, the OIG report clearly states there is strong, positive leadership and management at OCB.

Page 14 of the draft GAO report discusses the high proportion of OCB's budget that is spent on television delivery. To clarify a point, as in any U.S. government agency, decisions regarding reallocation of resources among Agency programs involve a number of decisionmakers, including the OCB Director, the BBG Board, the Executive Office of the President (through OMB) and the Congress. In particular, OCB's television transmission was the focus of a wider inter-agency examination through the CAFC process (the Commission on Assistance to a Free Cuba), which recommended an airborne transmission platform (CAFC I) and DirecTV transmission (CAFC II) as high priorities.

On page 17 of the draft report, GAO discusses the possible distribution of TV Marti via DVD. We simply note that, while the text notes that DVD distribution within Cuba could be more cost effective than the current transmission methods, the BBG is not aware of an effective method of ensuring the availability of these DVDs inside Cuba. OCB delivers news daily and hourly. Distribution of DVDs with such immediacy seems unlikely at best. And there would be no means to ensure that Cubans inside Cuba would have access to the DVDs. In addition, the physical distribution of DVDs inside Cuba almost certainly contains some level of personal danger both for those distributing the DVDs and for those who seek to access them, and may involve questions of law that go beyond the scope of our mission or capabilities. We do not object to USINT Havana exploring the possibility of distributing DVDs of OCB's programming, but we believe it problematic to imply that this might accomplish the goal of broadcast transmission.

Pages 20 and 21 of the draft report state, "In recent years, IBB and OCB have attempted to better understand and quantify the extent of jamming and its impact on the technical reception of Radio and TV Marti broadcasts. Despite their efforts, they still lack reliable data on the number, location, type, or effectiveness of Cuban jamming equipment. As a result, it is unclear how much of the radio and television signals can be heard and seen." We note that while any additional information regarding Cuban jamming capabilities is of course useful to OCB and decisions on transmission, obtaining such information to a large degree lies beyond BBG's capabilities.

On page 25 of the draft report, GAO provides information on the status of OCB's strategic plan and states that: "Without a formal, approved strategic plan, BBG and OCB lack an agreed-upon approach to guide such decision-making regarding OCB funding and operations." We believe this statement is somewhat misleading. As noted in the draft report, the BBG recently completed and circulated its 2008-2013 Strategic Plan, and OCB has submitted a revised draft of its long-range strategic plan for review by the Acting Deputy Director of IBB and the BBG. IBB, in concert with BBG's staff, is working with OCB to strengthen further the plan's alignment with the BBG's strategic plan. While this is being done, the BBG provides specific guidance with regard to OCB's budget and conducts monthly meetings to review and address any strategic issues that arise. Additionally, the Acting Deputy Director of IBB is in regular contact with the OCB Director to discuss such issues.

On page 28 of the draft report, GAO attempts to address the degree to which OCB broadcasts adhere to journalistic standards, particularly in the area of balance and objectivity. We believe it



**Appendix II: Comments from the  
Broadcasting Board of Governors**

6

is important to clarify that based on the assessment of IBB Performance Review, OCB has met basic journalism standards. In fact, though as in all broadcast services (public or private) there are always areas for improvement – such as, in OCB’s case, long monologues in the discussion show and in their overall guest selection – in the past year, OCB has made progress in significantly reducing the presentation of views (as opposed to news) in its newscasts, increasing its coverage of Latin America-related issues, and taking greater care in the airing of stringer reports from Cuba. Indeed, this view is substantiated on page one of the OIG’s 2007 report on Inspection of the Office of Cuba Broadcasting (ISP-IB-07-35), which stated: “IBB quality reviews show that radio and television broadcasts have markedly improved over the past two years in production quality and content.”

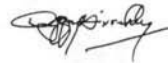
Finally, on page 40 of the draft report, we are pleased to note that, despite one case of suspected fraud (that was referred by the Agency to the State OIG), GAO found that, “[o]ther allegations, however, have not been substantiated.” During a six-month investigation, GAO’s Office of Forensic Audits and Special Investigations found that much of the evidence it investigated “was anecdotal or hearsay and did not provide a sufficient basis to continue the investigation.”

Again, the BBG appreciates the opportunity to provide comments on the GAO’s draft report. While we believe that additional context in the draft report would strengthen certain portions of the analysis and conclusions, we are in general agreement with GAO’s recommendations and look forward to implementing them.

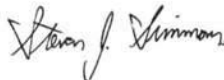
Sincerely,



Joaquin Blaya  
Member



D. Jeffrey Hirschberg  
Member



Steven J. Simmons  
Member

---

# Appendix III: GAO Contact and Staff Acknowledgments

---

## GAO Contact

Jess T. Ford, Director, (202) 512-4128, [FordJ@gao.gov](mailto:FordJ@gao.gov)

---

## Staff Acknowledgments

In addition to the individual named above, John Brummet (Assistant Director), Jason Bair, Emily Gupta, Natalie Sirois, Etana Finkler, Martin de Alteriis, Ernie Jackson, and Adrienne Spahr made key contributions to this report. Joseph Carney, John Hutton, Timothy DiNapoli, Katherine Trimble, Justin Jaynes, Leigh Ann Nally, Bruce Causeaux, Gary Bianchi, Ryan Geach, Madhav Panwar, R. Gifford Howland, Jennifer Young, Charlotte Moore, Armetha Liles, and Colleen Miller also provided assistance.

---

## GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

---

## Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through GAO's Web site ([www.gao.gov](http://www.gao.gov)). Each weekday afternoon, GAO posts on its Web site newly released reports, testimony, and correspondence. To have GAO e-mail you a list of newly posted products, go to [www.gao.gov](http://www.gao.gov) and select "E-mail Updates."

---

## Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's Web site, <http://www.gao.gov/ordering.htm>.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

---

## To Report Fraud, Waste, and Abuse in Federal Programs

Contact:

Web site: [www.gao.gov/fraudnet/fraudnet.htm](http://www.gao.gov/fraudnet/fraudnet.htm)

E-mail: [fraudnet@gao.gov](mailto:fraudnet@gao.gov)

Automated answering system: (800) 424-5454 or (202) 512-7470

---

## Congressional Relations

Ralph Dawn, Managing Director, [dawnr@gao.gov](mailto:dawnr@gao.gov), (202) 512-4400  
U.S. Government Accountability Office, 441 G Street NW, Room 7125  
Washington, DC 20548

---

## Public Affairs

Chuck Young, Managing Director, [youngc1@gao.gov](mailto:youngc1@gao.gov), (202) 512-4800  
U.S. Government Accountability Office, 441 G Street NW, Room 7149  
Washington, DC 20548