Ombudsman Mechanism as A Public Relations Strategy for Broadcasting Stations in Nigeria

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ABSTRACT
One postmodernist sensibility that is apparent on our contemporary media landscape is that normative views of media have generally taken a pluralist and anti-essentialist turn. Pluralism and diversity have become undisputable values, and ranks among the few politically correct criteria for achieving optimal performance and regulation in media practice. The ombudsman is a media practitioner which media role and utility have taken a detour and assumed such a pluralistic bent, and so embraces diversity. Thus, the paper observes that far from the traditional and stereotypical role of the ombudsman as self-regulatory measure for the broadcaster, the ombudsman can be used as a public relations strategy for effective broadcast programming. The paper therefore recommends that in the face of myriad of audience complaints against broadcast programming in Nigeria, especially with the necessity of preserving the editorial and programming freedom of the broadcaster, the institution of the ombudsman can be a formal or established process by which broadcasting stations can resolve audience-related complaints and controversies and secure acceptance before the audience and other critical stakeholders without any external pressures.

Keywords: Ombudsman, Public Relations, Broadcasting Stations and Nigeria

INTRODUCTION
As a management function, public relations evaluates public attitudes, identifies the policies and procedures of an individual or organization with the public interest and plans and executes a programme of action to earn public understanding and acceptance [1,2,3]. It is therefore the function of an organization with its public relations office to be externally oriented in order to make the company sensitive to the concerns of the external environment and to convince the external environment, which in the main is the public, of the worthiness of organization’s positions and activities. The opinion of the public is highly important to every organization [4,5,6]. The pressure of publics’ opinion can make or break a corporation, affect the sales and profits, influence its labour relations, fracture the line of confidence and determine the loyalty of its dealers and support of its stakeholders [7]. Public attitude is such a powerful force in the successful operation of every organization to the extent that opinion research should be a continuous procedure if it must be properly understood and evaluated. This in line with some public relations process models such as research, action planning, communication, and evaluation (RACE), research, objectives, planning, and evaluation (ROPE) and various others, which emphasize the need to analyze audiences to effectively tailor communication strategies for specific audience groups. Several scholars also, have developed various models and approaches to define target publics [8,9,10]. How we plan and do public relations (PR) depends on our understanding of the nature of audiences, stakeholders or public. Theories, concepts and models surrounding these three major keywords (audience, stakeholder and publics) are very important as they help us understand and explain our PR campaigns and therefore determine how we plan and conduct PR. Organizations striving to achieve favorable reputation do so by focusing their public relations strategies a great deal on understanding audiences, publics and stakeholders, and thus often direct their communications and PR services at audiences and stakeholders or publics.
through the mass media. The mass media, like other media of public relations, act as an intermediary between an organization and its target public that creates awareness for the organization with an ability to create a positive impact for the chosen audience [9,10].

Broadcasting (radio and television) is a mass medium of public relations, and because of its pivotal role in the advancement of other organizations’ public relations campaigns, broadcasters often behave as though they have no need for public relations, when actually the reverse is the case. Today, all tiers of broadcasting (public, community and commercial) have often been lampooned for operations that nestle down into what could be generally referred to as below public expectations. This is not minding the fact that their audiences, stakeholders and indeed the generality of their publics are already ill-at ease with their programming trajectories and general operations [11,12]. [13,14], insists that it is crystal clear that every medium is in varying degrees shackled to its set of overlords, while its policy is largely determined by the personal spites and ambitions of its proprietors. In confirmation of the fact, Dokun, (1987) also cited in Chukwu (Ibid) extends his diatribe in the direction to the private owned media operators, which he claims ensured that their interest, which is mainly financial or political or both are met through their publications and broadcasts. The attempt to establish the fact that broadcasting stations truly need public relations forms an aspect of the knowledge gap that this paper sets to fill.

[15,16] informs that during the 1990s and 2000s more than twenty public service broadcasters around the globe have chosen to have an internal ombudsman though the models are different. According to him, the ombudsmen have different working conditions and the problems and major issues facing them also differ a lot. But a number of basic ideas are nevertheless the same, and they are exactly the same as for all the media establishments that have decided to establish an internal ombudsman, a public editor, a reader’s editor or some similar position. Regardless of media type, the concept of the independent, resident ombudsman has a similar purpose, and that is basically about self-regulation and accountability. Especially for public service broadcasters, it is of the utmost importance to find out methods that can help to solve a fundamental problem which has to do with how to hold the independent media accountable. The focal point of things, under the prevailing model is how public service broadcasters can defend their editorial integrity. One important part of the answer is to create mechanisms of openness and transparency. It is also about finding ways to become a more responsive organization. For instance, this can be done by establishing a complaints system that gives the right to appeal, particularly as a real alternative to a self-sufficient and defensive response from the broadcaster. No solution is perfect. But the basic challenge is to acknowledge media’s great responsibilities and at the same time defend the independence of responsible media and freedom of expression. It is about simple and yet effective ways of self-regulation that can help promote free and accountable media and improve quality. And it is about developing practical methods of creating media that have an open relationship with their audiences.

With the same intention, [17], maintains that ombudsman is spreading to more and more television and radio stations, and to big web-based news media that seek to achieve greater trust on the side of their publics, but it is important to realize that the entire mechanism has always been anchored on the well-known newspaper model of self regulation. Therefore, it is understandable that though ombudsman in broadcasting organizations has often been viewed as a self-regulation mechanism, it is only noteworthy that in our protean poetics of contemporary broadcasting, the ombudsman institution that in itself is also in a constant flux, when deployed as a public relations mechanism for the broadcaster, is apposite enough to be round peg in a round hole. Broadcasting organizations have the management assignment of bridging the trust-gap between their audiences and stakeholders,
and should do this by hiring someone to man their public relations. The expert works on increasing their credibility within the framework of their operations, including programming, and as well increasing their overall reputation. To this end, the paper makes a case for the ombudsman to shoulder the public relations responsibilities of the broadcaster, and this forms the other aspect of the knowledge gap that the paper aims at filling. This, therefore, is the preoccupation of this paper, and to do justice to it, some basic concepts shall be examined, beginning with that of the ombudsman.

**Understanding the Ombudsman**

Whatever the case, the ombudsman was an indigenous Swedish, Norwegian and Danish term, *ombudsmand*, which means "representative and someone who has the authorization to act for someone else, a meaning it still has in the Scandinavian languages [15]. Thus, the contemporary use of the term began in Norway, and was followed by Sweden with the Swedish Parliamentary Ombudsman instituted by the government of 1809, to safeguard the rights of citizens by establishing a supervisory agency independent of the executive arm of government [5]. He maintains that the predecessor of the Swedish Parliamentary Ombudsman was the Office of Supreme Ombudsman, which was established by the Swedish King, Charles XII, in 1713. Charles XII, he notes, was in exile in Turkey and needed a representative in Sweden to ensure that judges and civil servants acted in accordance with the laws and with their duties. The Supreme Ombudsman, in line with his revelation, reserved the right to prosecute those guilty of misdemeanor in the direction. In 1719, the Swedish Office of Supreme Ombudsman became the Chancellor of Justice, while, in what appears to be a reflection of the separation of power mechanism, the Parliamentary Ombudsman was established in 1809 by the Swedish Riksdag, as a parallel institution to the still-present Chancellor of Justice. The Parliamentary Ombudsman is the institution that the Scandinavian countries subsequently developed into its contemporary form, and which subsequently has been adopted in many other parts of the world [11].

Ideally, the ombudsman typically has a broad mandate that allows him to address overarching concerns of public interest, and sometimes the interest bordering on the private, sector. The mandate given to an ombudsman extends over only a specific
sector of society. It depends on the terms of engagement, for instance, a youth's ombudsman may be tasked with protecting the rights of youths and perhaps other young people of a nation. The broadcaster's ombudsman shoulders the responsibility of addressing public complaints with a view to ensuring good will on the side of the broadcasting station. Furthermore, in Belgium, the various linguistic and regional communities have their own ombudsmen, while in the United States, members of the United States Congress serve as ombudsmen at the national level, representing the interests of their constituents and maintaining staff. He, the ombudsman, may also in this case be tasked with advocating for constituents faced with administrative difficulties, especially those caused by maladministration. Similarly, ombudsmen are in place across a wide variety of countries and organizations within those countries, may be appointed at a national or local level, and are often found within large organizations, where they focus exclusively on and deal with complaints regarding a particular organization or public office, or perhaps saddled with a wider range of assignments.

There is, therefore, a variety of ombudsmen. Some of them include an industry ombudsman, such as a consumer or insurance ombudsman who deals with consumer complaints about any unfair treatment the consumer has received from a private company that operates within that industry; often and especially at the government level, an ombudsman will seek to identify systemic issues that can lead to widespread rights violations or poor quality of service to the public by the government or institution in question. Again, a large public entity or other organization, such as a broadcasting station, may have its own ombudsman. In broadcasting stations, the ombudsman, depending on the appointment, may investigate specific audience complaints about the services or other interactions relating to the station's programming and general programme production. The broadcaster's ombudsman just like other ombudsmen within organizations may also have a primary function of dealing with internal issues, such as complaints by employees, just in the same fashion that an educational ombudsman in an educational institution would handle complaints by its students. At the national level, ombudsman duties may be more wide-ranging. For example, some countries have ombudsmen in place to deal with issues such as corruption or abuses of power by public officials. Furthermore, some countries have ombudsmen whose main function is to protect human rights within those countries. While an ombudsman is usually publicly-appointed, they will typically have a large degree of independence and autonomy in fulfilling their function. This is to enable the official to act in a fair and impartial way to all parties involved in a complaint.

Specifically in politics, an ombudsman is generally a state official appointed to provide a check on government activity in the interests of the citizen and to oversee the investigation of complaints of improper government activity against the citizen. If the ombudsman finds a complaint to be substantiated, the problem may get rectified, or an ombudsman report is published making recommendations for change. Further redress draws its efficacy on the laws of the country concerned, but this typically involves financial compensation. Generally, ombudsmen in most countries do not have the power to initiate legal proceedings or prosecution on the grounds of a complaint. This role is sometimes referred to as a "tribunician" role, and has been traditionally fulfilled by elected representatives. However, the major advantage of an ombudsman is that he examines complaints from outside the offending state institution, thus avoiding the conflicts of interest inherent in self-policing. This is evident in the case of heavy reliance of the ombudsman system on the selection of an appropriate individual for the office, and on the cooperation of at least some effective official from within the apparatus of the state. This is more so in the context of severe criticisms against the institution, particularly as relics of absolutism, designed to iron out the worst excesses of
administrative arbitrariness while keeping the power structures intact [12].

[16] informs that the private companies, public corporations, non-profit organizations and government agencies also have an ombudsman or an ombudsman's office to serve internal employees, and managers and/or other constituencies. He went to insist that the ombudsman's roles are structured to function independently, by reporting to the Chief Executive Officer (CEO) or board of directors, and that in tandem with International Ombudsman Association (IOA) Standards of Practice, the ombudsman does not have any other role in the organization, more so as he, the ombudsman, receives more complaints than alternative procedures such as suggestion boxes and anonymous hot-lines. Accordingly, since the 1960s, the profession has grown in the

Explaining Public Relations

Public relations is the professional maintenance of a favorable public image by companies, other organizations or even famous persons. It is a management function that establishes and maintains two-way, mutual relationships and communications between an organization and its publics and stakeholders (i.e. those who have a stake, such as employees, shareholders, etc.) that often determine their success or failure. [6] defines public relations (PR) as the practice of deliberately managing the release and spread of information between an individual or an organization (such as a business, government agency, or a nonprofit organization) and the public in order to influence the favourable public perception. In what appears to be a more encompassing definition, [8], views public relations as a full-fledged and autonomous profession and therefore defines it as:

The management function that identifies the policies, interests, needs and wants of an organization on the other hand, and then identifies the interests, wants, needs and demands of the publics/stakeholders of the organization on the other hand, then develops and implements a well researched and communications aimed at reconciling these seeming conflicting interests, wants, policies and needs (p.11).

Drawing on the definitions, public relations and publicity differ in that PR is controlled internally, whereas publicity is not controlled and could embrace external parties. Public relations may include an organization or individual gaining exposure to their audiences using topics of public interest and news items that do not require direct payment [12].

PR is also different from advertising as a form of marketing communication because rather than being sponsored or paid for, it aims at creating or obtaining coverage for clients for free. Other several factors are overarching in the definitions, including the fact that PR is part of an organization’s overall marketing and communications function. With the aid of PR, an organization's diverse publics are engaged across media platforms including third party and social media. This underscores the primary role of public relations as the protection of the organization’s reputation and provision of crisis management where necessary. Furthermore, PR strategies are formulated to accomplish set objectives.
with an understanding of the search optimization opportunities that would ensure healthy relations with the media, community, customers, corporate and financial bodies, investor and stakeholders, among others [12].

One of the theoretical frameworks for public relations practice is, according to model, which posits that when effectively applied, public relations itself has the potentiality of reverting adverse or negative situation into suitable, positive and favorable achievements. The implication therefore, in the context of this paper, is that with effective public relations strategy, a negative scenario of an organization can be reversed. The evidence of such negative scenario could be found in Nigerian broadcasting as buttressed available literature on audience complete neglect of or apathy to radio and television programmes. This, therefore, makes it necessary for broadcasting stations to institute the ombudsman mechanism to undertake public relations responsibilities geared towards securing the audience as the public of the broadcaster.

Audience as the Public of the Broadcaster’s PR

The publics of public relations are groups of people, while the public is the totality of such groupings. While noting that PR public is different from the public of the public sphere,[5] informs that the public is a different concept to the public sphere. She adds that it is one of the more ambiguous concepts in public relations and communication science. Corroborating this stance, [13] views a public is distinct from a stakeholder or a market, because a public is a subset of the set of stakeholders for an organization that comprises those people concerned with a specific issue. Thus, whereas a market has an exchange relationship with an organization, and is usually a passive entity that is created by the organization, a public does not necessarily have an exchange relationship, and is both self-creating and self-organizing.

Publics are targeted by public relations efforts. In this case, target publics are those publics whose involvement is necessary for achieving organizational goals; intervening publics are opinion formers and mediators, who pass information the target publics, and the influential publics are the elite members of society that the target publics turn to for consultation and other referential services, because their value judgments are influential upon how a target public will judge any public relations material [16]. The public is often targeted especially in regard to political agendas as their vote is necessary in order to further the progression of the cause.

Broadcasting is a two-way process. It is an interactional experience between a broadcaster at one end and the receiver (the audience) at the other end. A piece of broadcast message that is not received by its target audience is an exercise in futility. The object of the activity of information dissemination or broadcasting is the target audience. According to Ezaka (2021), the target audience for the electronic media is that segment of the general population that is aimed at being motivated, and who is likely to accept the message, and act accordingly. The optimism that mass media could function as powerful persuader, which grew from western social scientists, gave rise to the speed in acquiring and monopolizing broadcast technological infrastructure among the governments of third world countries of Africa, Asia and other developing continents. One aspect of such optimism is that societal modernization should always be accompanied by the exposure to mass communication (Ezaka, 2018; Moorman, 2019). The promises from this offer aroused hopes that broadcasting could be used as “magic multiplier” or “mass educator” to mobilize people, who are the audience, to embrace the tasks and challenges of nation building. Consequently, policy makers, developers and broadcast practitioners envisioned the audiences and people, who are not crewmembers as passive consumers of broadcast messages, and as targets of broadcast persuasion or manipulation.

Over the years, it became evident that mere exposure to broadcast channels seemed less likely to influence change. For change to occur, broadcasting must function
through a nexus of other mediating influences and forces that revolve around motivational criteria, individual-information seeking strategies and socio-cultural considerations. Thus, there are audience motives, preferences and individual differences, and there are also reasons that can lead to different patterns of broadcast consumptions. All these can easily predict the effects of such exposure on the audience. There are differences in socio-economic statuses, which can lead to gaps in effects between information-rich and information-poor consumers. The attitude of an audience towards a broadcast medium is another mediating factor. This is important in predicting the audience receptivity to broadcast messages from their sources.

Therefore, broadcaster’s programming is exclusively targeted on the audience, and so the broadcaster’s public relations is primarily about reputation building essentially meant to attract and retain the audience within a coverage area. The targeted audiences of the broadcaster include listener/viewers and other key stakeholders such as legislators, event sponsors, employees, community partners, etc. A painstaking PR campaign includes at least some segmentation by audience that could be connected through the instrumentality of paid or earned media, all at the disposal of the PR practitioners.

Target audiences are usually described in demographic terms which include such information as age group, sex, education, occupation, and so on. As most variation in listenership/viewership is related to the age of the audience, target audiences are most often expressed in terms of age groups. The target audience of a broadcasting station can be identified, for instance, by the station’s image and house style such as the music it plays as typical music format stations. Another feature of house style is the language the presenters use on air and other media-artistic indices that command public perception.

It is much more demanding on the side of public broadcasters, which often run exceedingly complex operations that qualify them as multi-media organizations. The situation is arguably powered by convergence such that it is in the norm for public service broadcasters across the globe to have several television channels and/or radio sub-stations. As part of the mosaic, there is often a website with many special features existing as integrated part of the media organization. It is also becoming more and more common to produce content for mobile phones and/or smart-phones, to provide podcasting, and so on. The wide variety in programming and the many different audiences provide a big challenge for regulators, and likewise for attempts to give self-regulation a large and central role.

Today, broadcasting on multiple platforms are rapidly becoming the new standard for media companies - including the traditional print-based publishers. And as with the practice with many modern public service broadcasters the same output is often used on many platforms. The audience uses a number of different channels, and follows different programmes. There are also big differences in the audiences from channel.

One major issue among broadcasters has been the fundamental separation between programme producers and their audiences. It is a separation that is at odds with its technological basis. The audiences must be transformed into witnesses in interviews and conversations and must have the opportunity to be heard.

A broadcasting station’s audience must be understood as the sum of its listeners and those who follow it on social networks. While the first kind of audience still receives radio and television in a traditional way, members of the second set are connected to each other and to the host within a network. The convergence of broadcasting and social media heavily modifies both the vertical relationship between the host and the audience, and the horizontal relationship between individual listeners/viewers. The network of friends/fans of a broadcast programme on Facebook, for example, constitutes its specific social capital. For instance, while the FM or digital radio audience, measured through traditional audience rating
systems, constitutes the economic capital of the station, the social media audience represents its true social capital i.e. one that is very tangible and visible. A wide social network is of great importance for the future of broadcasting stations. Even if the fans' network does not generate a tangible economic value like radio audiences do, it generates a significant amount of reputational capital. The crisis in traditional mass advertising will lead to a future increase and refining of tools for the capitalization of the wealth of these networked audiences.

Today, there is a taxonomy of audience complaints including airing of obscene programming at any time. It is even a violation of communication law to broadcast indecent or profane programming during certain hours. In Nigeria, National Broadcasting Commission (NBC)'s Nigeria Broadcasting Code defines indecent speech as material that, in context, depicts or describes sexual or excretory organs or activities in terms patently offensive as measured by contemporary community standards for the broadcast medium. NBC has the responsibility for administratively enforcing the law that governs these types of broadcasts. The NBC has authority to issue civil monetary penalties, revoke a license or deny a renewal application. The NBC vigorously enforces this law where there are violations. In addition, the government department of Justice has authority to pursue criminal violations. Violators of the law, if convicted in any court of law, are subject to criminal fines and/or imprisonment.

The Ombudsman Mechanism as Public Relations Strategy for Broadcasting Stations

To have an independent ombudsman is a way of showing a willingness to be open and accountable. At the same time it is a way of reducing the need for external control - because the broadcaster commits itself to being held accountable by its own independent controller. The broadcaster has to contend with audience satisfaction and at the same time has to deal with pressures from the government and other politicians on programming pattern and general operations. Some politicians particularly have strong opinions about the coverage of sensitive issues, despite the fact that the broadcaster has responsibility and objectivity as watch words in ensuring the highest broadcast standards. At its best, the broadcaster aims at independent programming with a view to holding those in the corridors of power accountable. The important point, especially in the context of this paper, is that the broadcaster also has to be held accountable, and to do this, it must carry out some public relations activities in order to earn the favorable disposition of the audience and other stakeholders. This is because without relying on public relations strategies, such
quest for goodwill on the side of the broadcaster could be achieved by either close state regulation or direct intervention from the government, and this will inevitably compromise the editorial and programming independence and integrity of the broadcaster.

The introduction of the ombudsman mechanism as a public relations strategy for the broadcaster becomes a necessary end. The concept of an independent, resident ombudsman to be complemented by other forms of self-regulation and transparency mechanism of the broadcaster is arguably important in cultivating, maintaining and redeeming (in the event of any nose-diving tendencies) the image of the broadcaster, especially in our atmosphere of free press. It will ensure responsible and responsive programming that would make close and intimidating state control unnecessary. [3] insists that effective public relations communication begins with good organizational performance. This, he maintains, involves having good policies, being good community neighbors, fulfilling obligations, engaging in worthy activities and fulfilling its mandate.

Broadcasting as a veritable instrument of governance is within the concentric of discussions about political influence and editorial independence; this often creates controversies much stronger than those of national dailies. The citizenry has strong feelings about the broadcaster which represents their mouthpiece. Many politicians and governments design strategist measures to influence the broadcast content. It is indeed such engaging media environment that requires carefully planned public relations campaign to secure audience-friendly reputation. The situation becomes the more demanding if we recall that the broadcaster, at all levels and tiers, has historically been subject to different patterns of ownership, governance, financing, legislation and regulation. The many and varied models of the ombudsman transcends the deployment of the ombudsman as a public relations strategy and self regulatory mechanism.

However, for the purpose of public relations for broadcasting stations, the ombudsman should be viewed as a two-way mechanism for dissemination of information to the broadcaster and through it to the public. To the extent that the broadcaster reflects public opinion, the ombudsman’s public relations service can also be regarded as a mirror for public opinion. To this end, the ombudsman should be seen as different from other broadcast departments and units, and has to assume added responsibilities and has to be treated with greater confidence.

In practice, the ombudsman’s public relations service has to provide as promptly as possible, for public consumption, day-to-day press releases and other background information put out from time to time in different languages spoken by the audience within the coverage area. In addition, the ombudsman has to arrange briefings and meetings for the audience and other stakeholders to be carried along in the changing programming trajectories and other innovational operations of the station.

Again, the ombudsman when used as public relations mechanism should ensure the broadcast organization has trained and full-time content staff to man the station’s programming, provide press representatives with information sought from the management of the station and clarify doubts and controversies arising from the station’s programmes, provide management with the feedback, including policies, programmes and performance from the audience. Thus, on a general note, the ombudsman has the following functions to perform:

1. Watchdog: In this respect, the ombudsman acts as an independent but internal critic of the programmes of a station. As a management officer. He has the right (and obligation) to take an independent position and to broadcast criticism whenever appropriate, since the audience can approach him and ask for intervention in areas of need in respect of the station’s programming.

2. Head of appeals: As a head of appeals in connection with a formal complaints
system, the ombudsman receives and handles complaints such as those bordering on ethical issues or a breach of programming standards. In earlier briefings and meetings as mentioned above, the complainant is informed about the right to appeal to the ombudsman. In tandem with the general tradition that ombudsman recommendations will always be respected, the ombudsman, after due investigation and consideration of the case, gives recommendations to the management.

3. On-air personality: In this case, the ombudsman anchors a broadcast programme, often with a dedicated website of opinion box where letters from the audience are collated. As the presenter, the ombudsman also presides over discussions on current issues of concern to the audience, alongside the public’s complaints to the responsible presenter and announcers on air, and makes sure that relevant criticism is addressed properly.

4. The mediator: As a mediator, the ombudsman explains the operations of the broadcasting station he represents to the audience within the coverage area on one hand, and the other explains the audience to the station. With dialogue and compromise premised on a serious and open debate on the disputed issue, the ombudsman secures mutual understanding, since he does not have the authorization of a referee who could decide what is right and what is wrong.

5. Advocate of the audience: As the communicating and responsive representative of listeners and/or viewers, the ombudsman regularly surveys complaints and comments from the audience. His priority is the concern of the audience, which besides programming ethics, embraces practical problems with sounds, technical problems with the website, criticism over the closing-down of a popular series, dissatisfaction with retransmissions in prime time and so on. The ombudsman owes explanations of whatever that is of concern to the audience.

CONCLUSION

Acutely aware of the existence of external ombudsman such as National Broadcasting Commission in Nigeria that regulates broadcast programming in Nigeria, the institution of an internal ombudsman in broadcasting organizations to grapple with public relations issues shall be apposite enough. He shall, from the management’s perspective, evaluate complaints formally against infractions that relate to codes of conduct, practice and programming. Equally, he, by so doing, shall represent the station before the external broadcast regulator if the need arises. In the case of broadcast stations that also have programming-standards-executives, apart from the ombudsman, the latter strictly focuses on public relations service while the former’s assignment is purely regulatory. The programming standards executives set ownership policies and house styles, and often participate in resolving serious and ethical complaints, as may be necessary in specifying an appropriate timeline for the two institutions.

REFERENCES

roles and operations, a Legal guide, ABA.


