House Panel OKs Cable Reregulation Bill

fter a prolonged and divisive A markup, the House Telecommunications and Finance Subcommittee voted 17-7 April 8 in support of Chairman Edward J. Markey's legislation to reregulate the cable television industry.

The vote came after a one-week delay in markup forced by the defection of four subcommittee Democrats to support for the weaker Republican bill, which is opposed by consumer advocates on the grounds that it could actually cause cable rates to rise.

In the end, a compromise by Rep. Markey (D-MA) won back the support of Rep. Ralph Hall (D-TX), which was enough to defeat the weak Republican bill on a 12-14 vote. Subcommittee Democrats Thomas J. Manton (D-NY), Bill Richardson (D-NM), and James H. Scheuer (D-NY) all supported the Republican bill and voted "present" on the final bill.

Three Republicans—Matthew J. Rinaldo (R-NJ), Michael Bilirakis (R-FL), and Carlos J. Moorhead (R-CA)-voted in support of the final bill.

"While we did not get everything we wanted, we nonetheless accomplished our most important goal, which is to get this legislation moving," said CFA Legislative Director Gene Kimmelman. "Ultimately, consumers fared pretty well in light of the massive attempts by the cable industry and the administration to undermine and delay this legislation."

Rates For Basic Service Would Be Regulated

As passed by the subcommittee, the unnumbered bill would require the Federal Communications Commission to set a pricing formula for local cable operators to use in setting rates, under the oversight of local franchising authorities, for a basic tier of cable service.

That basic tier would include, at a minimum, all broadcast networks, including popular "superstations" such as WTBS out of Atlanta, as well as public access channels. Supporters are hopeful that inclusion of the superstations on the basic tier will lead to advertising pressure on cable operators to include other popular channels-such as CNN, ESPN, and MTVon the basic tier as well.

Like an earlier version of the Markey bill, the Senate bill passed in January would set even broader standards for the basic tier, requiring inclusion of the most popular stations.

The version supported by Republicans n the subcommittee would h rate regulation to a basic tier consisting only of local broadcast channels, plus public, education and government channels.



House Telecommunications Chairman Edward J. Markey (D-MA) maneuvered the cable bill through a contentious subcommittee markup.

Because cable operators would be under no pressure to keep popular services on the regulated basic tier, many consumers could actually see their cable rates rise under the Republican proposal, Kimmel-

Program Access Provision Included

Like the Senate bill, the bill passed by the House subcommittee also would restrict the ability of cable operators who own programming units to discriminate against cable competitors in the price, terms, and conditions of program sales. The Markey bill and Senate bill also explicitly prohibit exclusive deals between cable programmers and operators.

Such a provision is viewed as an essential step toward promoting competition to cable by giving potential competitors, such as satellite distributors and "wireless" cable companies, better access to programming.

This provision also is missing from the Republican bill, which would merely prohibit cable programmers from "unreasonably refusing to deal with" competing distributors.

The Republican bill is virtually identical to legislation passed by the House

New Conditions Require Tougher Controls

"Although CFA supported the cable legislation that passed the House last Cons, significant events in the interv ing two years make it imperative to add tougher controls on the cable industry," Kimmelman said in a March 30 letter to the subcommittee.

Despite a clear signal in the last Congress that the House would not tolerate continued cable rate hikes, the cable industry raised basic and popular cable rates at three times the rate of inflation in the last two years, he said.

In contrast to industry claims that price increases were necessary to compensate for rates kept artificially low by regulation, an August 1991 Department of Justice economic analysis found that up to 50 percent of cable's post-regulation price increases for expanded basic service have been unjustified.

Furthermore, to circumvent regulation under the Federal Communications Commission's new rules and legislation like the bill passed in the House last Congress, a large percentage of cable operators have retiered their programming.

"These changes have convinced not only consumers, but also the Senate, that this year's cable legislation must be tougher than last Congress's Housepassed bill," Kimmelman said. "Among other things, this year's legislation must take retiering into account to prevent the cable industry from evading Congress's goal of preventing monopoly pricing."

The president has threatened to veto any cable reregulation bill, and the White House has been lobbying hard against the bill in an effort to avoid a veto of a popular consumer bill in an election

As a result of this full court press by the administration, the cable bill is expected to face a contentious fight in the full committee when Congress returns in May and again on the House floor.

Kimmelman called on consumers to write to their members to demand quick passage of a strong bill similar to the one passed overwhelmingly by the Senate.

Energy Bills Pass Senate, Advance in House

omprehensive energy legislation, last Fall, now shows every sign of making it to the president's desk by the end of this Congress.

In February, the Senate passed S. 2166 on a 94-4 vote, just three and one-half months after a Democrat-led filibuster kept an earlier version of the bill from coming to the floor.

Meanwhile, parallel legislation, H.R. 776, is making steady progress through the House, with the nine committees that share jurisdiction working under a May 1 deadline to complete action on the bill's component parts.

Energy and Commerce Committee completed its consideration of the main body of the bill in March, voting 42-1 to favorably report the legislation.

While significant differences remain between the House and Senate bills, both ciency, clean coal technology, and use of renewable resources.

In addition, both bills are silent on the two issues that were the focus of last year's heated Senate debate-permitting oil and gas drilling in the Arctic National Wildlife Refuge and raising federal fuel efficiency standards for automobiles.

Bills Differ on **PUHCA Reform**

One major difference in the two bills lies in how they propose to restructure the electricity industry through reform of the Public Utilities Holding Company Act (PUHCA).

Consumer groups, including CFA, criticized the Senate provisions on the grounds that they remove all structural oversight for exempt generators, provide no alternative regulation, fail to address transmission access, pose a direct threat to least-cost planning, and actually prevent lower cost independent power from reaching consumers if it displaces higher cost utility-owned generation

Those provisions were improved somewhat by Sen. Donald W. Riegle's amendments to add stronger language

(Continued on Page 2)

CPSC Denies Toy Safety Petition

ismissing the recommendations of its staff and disregarding mountains of supporting evidence, the Consumer Product Safety Commission voted 3-0 in March against taking action to address the choking hazards posed by toys.

"Apparently, saving children's lives is not important to this agency," said CFA Product Safety Director Mary Ellen Fise, who blamed the decision on the Bush Administration's election-year deregulation campaign.

The proposed regulations would have required balls intended for young children to be too large to choke them and would have required toys to be clearly labeled to inform parents of the choking bazard.

Choking on small toy parts, balloons, marbles, and small balls is the leading cause of toy-related deaths. At least 186 children have choked to death in this way since 1980, and they continue to die at a rate of 15 a year.

In addition to CFA, 41 organizations and government leaders wrote to the CPSC urging adoption of the toy safety measures, including consumer advocacy or-

ganizations, injury prevention experts and other health groups, Rep. Cardiss Collins (D-IL), and the attorneys general from 27 states.

Legislation Not Strong Enough

Rep. Collins has introduced legislation that would accomplish what the agency refused to do through rulemaking.

That legislation was reported out of Rep. Collins's Consumer Protection Subcommittee in April as part of CPSC Reauthorization legislation, H.R. 4706.

Unfortunately, the CPSC reauthorization legislation to which the toy bill is attached is extremely weak. For example, it authorizes only \$45 million for the agency in fiscal year 1993 and \$48 million in 1994, compared to the \$50 million and \$52 million respectively advocated by consumer groups.

Furthermore, it contains no provision to repeal section 6-B of the Consumer Product Safety Act, which imposes cumbersome requirements on the CPSC for release of information to the public.

"This is a really streamlined reauthorization bill, and CFA is concerned that it doesn't go far enough," Fise said. "Given the agency's predilection for doing nothing, Congress should send a stronger message to the CPSC."

Neither CFA nor Consumers Union has endorsed the legislation.

In addition to the toy safety legislation, the bill also contains strong provisions related to bike helmets and weak provisions related to infant drownings in fivegallon buckets.

On bike helmets, the bill would require the CPSC to begin proceedings to harmonize standards for bike helmets. Such standards would have to include measures to protect against helmet roll-off and the risk of injury to children. In the interim, all helmets would have to meet either the ANSI or the Snell standards or any other standard CPSC determines is appropriate.

On buckets, the bill requires only that the CPSC begin a proceeding to consider labeling and/or establishing a standard to prevent infant drownings in buckets. At a minimum, Congress should require that all five-gallon buckets be labeled within 60 days of the bill's passage and that, within 18 months, CPSC establish a standard that incorporates passive protection against drowning for young children, Fise said.

Currently, children are dying at a rate of one child per week in five-gallon buckets.

Advocates Work To Strengthen Bill

Consumer advocates are working with members of full committee to get the bucket provisions strengthened. They also expect a repeat in full committee of an amendment defeated 8-9 in subcommittee to cut funding for the agency and are working to defeat that amendment.

So far, no companion bill exists in the Senate. If the legislation were to pass the House, however, the Senate could quickly pass a clean reauthorization bill to take to conference, where House supporters would attempt to maintain the stronger product-specific provisions in the House bill.

Credit Reporting Reform Bill Stalls In House

ouse Banking Chairman Henry B. Gonzalez (DTX) suspended consideration of legislation to reform credit reporting practices March 25 when it became clear that the committee was unwilling either to strengthen the bill or to strike its onerous preemption provision.

H.R. 3596, which was introduced by Consumer Affairs Subcommittee Chairman Esteban Torres (D-CA), is designed to protect consumers from errors in credit reports and to give people more control over how credit reports are used.

Against Chairman Torres's wishes, the bill was seriously weakened during sub-committee markup, however, losing the support of consumer advocacy organizations, including CFA.

Many of the weakening amendments were inserted at the behest of banks, large department stores, and other creditors, who are responsible for many of the errors and problems commonly blamed on the credit bureaus.

"Although the bill contains some important reforms, it fails to address many problems and abuses," the groups wrote in a March 30 letter to Chairman Gonzalez in support of his decision to suspend consideration. Because the bill would preempt stronger state laws, it is "a net loss for consumers," the groups wrote.

They encouraged Rep. Gonzalez to prevent the bill from going to the floor unless the preemption provision is deleted in committee first.

Consumer advocates suffered a series of defeats during the committee markup on amendments to require credit bureaus to give consumers at least one free report each year, for example, and to require lenders to establish reasonable procedures to maintain the accuracy of items they report.

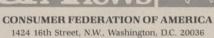
"The bill also does very little to correct the privacy problems associated with banks and finance companies," the groups wrote. "Since the committee rejected Rep. Charles E. Schumer's amendment to subject creditors to the same minimal privacy restrictions under which bureaus operate, the bill allows creditors to divulge information about their own customers without any restrictions."

Finally, the civil liability provisions of the bill are extremely weak, providing consumers with only limited ability to collect damages for false reports and the bill with little in the way of enforcement teeth.

"We must leave states free to close these gaps in federal law," the groups wrote. "Although we hope that H.R. 3596 can become law this year, we would rather have no bill reported out of the committee than one that prevents states from protecting their own citizens," they concluded.

Along with Chairman Gonzalez, Reps. Schumer (D-NY) and Bernie Sanders (I-VT) led the fight to strengthen the bill and strip the preemption provision.

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CFAnews is published eight times a year. Annual subscription rate is \$25 per year.

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Design & Typeset by: Grassroots Graphics

Energy Bills (Continued from Page 1)

on books and records and to make selfdealing by a utility illegal unless a state actively asserts that it wants self-dealing to be legal and will regulate it.

In a colloquy with Energy Chairman and bill sponsor J. Bennett Johnston (D-LA), Sen. Riegle (D-MI) also won assurance that the issue of transmission access would be dealt with in conference committee.

Consumer advocates consider transmission access an essential component of any reform effort, since, without it, utilities who control the transmission lines could stifle competition by denying competitors access to potential customers.

In contrast to the Senate bill, House PUHCA reform language crafted by Energy and Power Subcommittee Chairman Philip R. Sharp (D-IN) offers "the first real chance in over a decade for significant, pro-consumer reform of the electric utility industry," according to CFA Research Director Mark Cooper.

Strong PUHCA Reform Language Survives Markup

In a major victory for consumers, those provisions, which were expected to be highly controversial, survived the full Energy and Commerce Committee mark-up virtually intact, thanks to the tight reign maintained by Chairman John D. Dingell (D-MI).

On the central issue of transmission access, Rep. Dingell came up with a compromise that was acceptable to consumer groups and "kept utilities divided, which was the only way to pass the legislation," Cooper said.

Under that compromise, federal regulators can force utilities to ship a competitor's electricity on its transmission lines, with the utility guaranteed just compensation for the service.

Cooper said he is hopeful that the conference committee will retain the strong PUHCA reform provisions from the House bill, eliminate the bad provisions in the

Senate bill, and adopt Sen. Riegle's compromise on self-dealing.

Controversial Issues Remain

In April, the House Interior Committee marked up a bill that imposes tighter controls on both the nuclear industry and on off-shore drilling than those included in the Senate bill.

Among other things, the House bill would further restrict off-shore oil exploration util the year 2002, and it would provide more public and state say in the nuclear licensing process and authorize states to regulate low-level nuclear waste.

The Merchant Marine bill being marked up in April also contains stricter limits on off-shore drilling.

Both bills have drawn veto threats. The ability of lawmakers to work out a compromise on those issues that is acceptable to both houses and to the president could determine whether an energy bill is enacted this year.

Ailing Thrifts Push For Weaker Standards

hen Congress passed the savings and loan bailout bill (FIRREA) in 1989, they included phased in deadlines for the bill's higher capital standards.

Now that those deadlines are kicking in, a number of large ailing thrifts that cannot meet the higher solvency standards have returned to Washington, clamoring for a new type of bailout—this time in the form of shareholder payments, looser capital standards, and open bank assistance.

Aiding their case is the fact that no one in Washington wants to pay the political price for closing a number of large institutions in an election year, along with the fact that Congress has been paralyzed by the House Bank scandal and vicious partisan in-fighting.

As a result, regulators have taken matters into their own hands, undercutting many of the safety and soundness provisions in both FIRREA and last year's bank reform bill.

"The tough capital standards included in FIRREA and the early intervention standards placed on the FDIC Improvement Act of 1991 are being ignored as regulators have to face closing enormous thrifts which hold over \$80 billion in assets," said CFA Banking Director Peggy Miller. "The costs of such regulatory weakness will be devastating."

Capital Standards Weakened

In addition to simply failing to take supervisory action against undercapital-

ized thrifts and banks, regulators have weakened capital standards by allowing two forms of intangible assets—the right to service credit cards and the right to service mortgages—to be considered as capital.

"While the right to conduct these businesses does have some value, it is not cash and should not be considered capital," Miller said. "This is a serious erosion of the capital standards which were established to ensure that weak institutions would be merged or closed before losses mount."

Meanwhile, the Office of Thrift Supervision is pushing an "early resolution" plan under which federal money would be moved into undercapitalized thrifts without the changes in management and suspension of payment of dividends required by law and with no deadline for finding an acquirer.

Shareholders of the poorly managed thrifts would be paid to stay out of court while a merger was being set up, and the newly merged thrift would be allowed to continue managing the bad real estate assets, with the federal government covering all losses.

Such an approach is an exact replica of the "open bank, open thrift assistance" policies the two laws were designed to prohibit, Miller said.

"The evidence to date demonstrates that open bank assistance leads to an uncontrollable loss of depositor funds, wasted money, and a perception by shareholders and managers of other federally insured institutions that risky actions receive no penalty," she said.

Senate Bill Includes "Early Resolution" Funding

The RTC funding bill approved by the Senate in late March includes a provision to shift \$1.85 in RTC funds to OTS to support the "early resolution" plan. The amendment by Sen. Terry Sanford (D-NC) was added during committee markup.

The House, however, was unable to pass an RTC funding bill before leaving for the Spring recess in mid-April. As a result, they will be forced to tackle the issue again when they return in May if the administration can come up with a proposal that House Republicans will support.

CFA is working with Banking Chairman Henry Gonzalez (D-TX) and Reps. Bruce Vento (D-MN) and Jim Leach (R-IA) to craft an amendment that would prohibit the transfer of any RTC money to OTS to support "early resolution" policies or other attempts to weaken capital standards.

"When Congress passed FIRREA and the FDIC Improvement Act, no one thought it would be easy to resolve these problems, but walking away from the tough standards in these bills is not the solution," Miller said. "It will only add to the cost in the long run."

Regulators Approve Branching

Also in defiance of Congress, which refused to approve interstate branching during last year's bank reform bill debate, both the OTS and the Federal Reserve Board have approved interstate branching rules.

The OTS rule, which was made final in March, will allow thrifts which meet certain capital standards to branch across state lines. The branches will not be subject to the requirements of the Community Reinvestment Act.

The Fed passed a rule allowing banks to branch across state lines as long as the branch falls within a 30-mile radius of the bank's headquarters.

These actions were taken despite numerous recent reports, including reports by Fed staff, which show that consolidation does not produce the promised benefits and instead leads to anti-competitive market behavior.

In light of these studies, Miller wrote to the entire House and Senate in March urging Congress to stall, at least until better protections can be put in place, recent regulatory actions to allow nationwide branching as well as the rash of mega-mergers currently taking place.

While it may be possible in this Congress to forestall further weakening of capital standards, however, Miller said it was unlikely that Congress would deal with the branching issue before next year.

"The votes simply aren't there," she said.

Consumers Want More Credit Card Information

arge majorities of consumers want more information about credit card rights, costs, and benefits, according to a national survey sponsored and developed by CFA, Bankcard Holders of America, and AT&T Universal Card Service.

Moreover, the survey, which was conducted by Opinion Research Corporation of Princeton, New Jersey, found that the consumers who want this information most are those who need it the most—the young, those with large credit card balances, and those most worried about paying off credit card debts.

The survey was released in April at a Washington, D.C. news conference in conjunction with National Credit Education. Week

"The survey findings clearly demonstrate that consumers remain highly concerned about credit card rates and debts and strongly desire more information about credit card costs and rights," said CFA Executive Director Stephen Brobeck, who prepared the report on the survey findings

Credit cards are used by the majority of the nation's households. Even during the recent recession, while consumer use of most other forms of credit declined, the use of credit cards increased.

Today, consumers pay several billion dollars directly in credit card interest and fees, and an additional several billion dollars indirectly in higher prices resulting from fees charged merchants for credit card use.

Moreover, Brobeck said, there is evidence that credit card borrowing and charges have contributed to growing

family financial problems as reflected by the significant increase in personal bankruptcies.

"We believe that improved consumer information and education can help remedy these problems," he said. "For that reason, we wanted to learn more about what types of information consumers desire and the most effective ways to deliver this information."

The following were among the survey's specific findings:

- Most consumers do not believe they need to maintain large credit balances, with their attendant costs, to survive financially. Only nine percent said that, if they did not have a credit card, it would be "harder for [them] financially."
- A majority (55 percent) are "very concerned" or "somewhat concerned" about meeting credit card monthly payments.
- A large majority (79 percent) said credit card rates are "too high," and another 11 percent said they are "somewhat too high."
- The desire for more information is widespread; 67 percent indicated it is important for them to "receive more information about the costs and benefits of different types of credit cards," while 81 percent said it is important for them to "receive more information about [their] credit card rights."
- The groups most likely to want additional information are the young, those with large credit card balances, and those most worried about meeting credit card payments.



CFA's Stephen Brobeck released the survey results at a Washington, D.C. news conference.

• The largest majority in the survey, 92 percent, said high school students should be required to take instruction in money and credit management.

• Respondents cited several sources they would first turn to for more information about credit cards. The most educated are much more likely than the least educated to consult written sources (e.g., government publications and libraries). The least educated are most likely to turn to a consumer group, family, or friends.

"Based on the survey results, it would make sense to target consumer education and information programs to the young, Blacks, those with large credit card balances, and those most worried about meeting credit card payments," Brobeck said. "The survey suggests that information can be most widely disseminated through multiple sources," he added.

In March, Opinion Research surveyed 1,006 adults broadly representative of the adult population. The 715 who said they hold at least one credit card were asked eight questions about their attitudes toward these cards. Survey results are accurate within plus or minus four percentage points.

Copies of the eight-page report are available for \$10 prepaid from CFA, 1424 16th Street, N.W., Washington, D.C. 20036.

Telcos Campaign To Deploy Costly Technology



S ince last summer, when the information services ban was lifted, the seven Baby Bell telephone companies have

launched an all out campaign to convince state and federal regulators and legislators to deregulate the companies' profits to fund accelerated deployment of a costly broadband fiber optic network.

By April, CFA had intervened on behalf of telephone ratepayers in nine state and several federal proceedings on the issue, including proceedings in New York, Maryland, New Jersey, Tennessee, Georgia, Oklahoma, Arkansas, Missouri, and Pennsylvania.

"Deregulation of profits combined with accelerated deployment of technologies is a radical, high risk gamble with ratepayers' money," said CFA Research Director Mark Cooper.

"The economic viability of broadband is dubious. It will cost hundreds of billions of dollars without any indication of market need and in spite of the fact that a variety of alternatives are emerging with a much lower price tag," he added.

At the heart of the case against the Baby Bell proposals are the following six points:

1) The case against rate of return

regulation has not been made.

In the past half century, while rate of return regulation directed the industry, near universality of service was achieved through constantly falling real prices for telephone service.

Telephone companies earned adequate returns to deploy the most advanced telecommunications network in the world. Furthermore, they invested in research and development and deployed more capital equipment than industry as a whole to achieve a rate of increase in productivity that was far above the national average.

"Rate of return regulation, when practiced with an even and firm hand, provides a fair opportunity to earn a return on investment that is commensurate to the reduced risk of a franchise monopoly," Cooper said.

2) The need for accelerated deployment of information age technology has not been proven.

The market-driven, decentralized approach to the information age taken in the United States has produced a much more intensive use of information age technologies than exists in Europe or Japan, Cooper said.

"On a per capita basis, we make three times as many telephone calls per month, have three times as many computers, and three times as many cable television subscribers," he said. "The array of services available here—from fax, to databases, to E-mail—is dazzling."

3) The relationship between deregulation of profits and accelerated deployment is doubtful at best.

"The justification offered for this radical change in regulation is the unproven need to give telephone companies more freedom and incentives to improve service and invest in infrastructure," Cooper said. 4) Rates of returns are clearly excessive, and telephone companies have wasted these funds from the ratepayer point of view.

In 1984 and 1985 telephone companies asked for and received massive, unjustified rate increases along with increases in return of and on capital, Cooper said. While the cash flow of the telephone companies increased dramatically between 1984 and 1990, capital expenditures did not keep pace, and an ever increasing part of those expenditures was devoted to non-network activities.

Dividends to stockholders, on the other hand, have increased consistently. Stockholders also benefited from the diversion of a significant part of the companies' additional cash flow into the acquisition of unregulated businesses.

"In essence, the rate increases of 1984 and 1985 have gone to increase stockholder payouts and values not into the network," Cooper said.

5) Abuses have been pervasive and are likely to increase under relaxed regulation.

Since divestiture, every Bell operating company has been caught engaging in a number of abuses of ratepayers, competitors, and consumers, and the incentives for abuse will only increase as companies move into competitive information services, Cooper said.

"The accelerated deployment and depreciation combined with deregulation of profits being pushed in a number of states are cases of blatant gold-plating which are intended to lay the groundwork for monopolization of enhanced services and excessive profits for decades to come," he said.

"Regulatory reform, especially pricing flexibility, reduced regulatory oversight, and accelerated investment in excess and extravagant technology would institutionalize the pattern of abusive behaviors of the local companies," he said.

6) If there is a need for social investment in infrastructure, it should be subject to much greater oversight in the form of least cost planning for investment in infrastructure.

"When telephone companies invoke the specter of infrastructure investment, but fail to present credible evidence that investment in these facilities will either lower costs or increase revenues in a reasonable time frame, they abandon the fundamental principles of economics and seek to make social, not economic, investments," Cooper said.

"In addition to resulting in rates that are too high, such mistakes burden the economy with an entire generation of excessive costs and inefficient infrastructure, create a network that is far less reliable because it is too complex, or deny resources to much more productive investments," he said.

"The regulatory protections we advocate will simply shield consumers from the abuse of telephone company monopoly power, while ensuring that universal service is achieved at the lowest reasonable cost," he said.

State and Local Group Directory Published

The 1992 Directory of State and Local Consumer Organizations, listing 428 grassroots advocacy groups in 47 states and the District of Columbia, is now available from CFA.

The publication, which updates CFA's 1987 state and local directory, was developed with the assistance of the Food Marketing Institute. Most listings include the organization's address, phone number, contact person, date established, number of members, and priority issues.

An analysis of the listings demonstrates both that the consumer movement is extremely stable—386 of the 428 organizations listed were in existence five years ago, many of them established in the 1960s and 1970s—and that it continues to grow—39 organizations were established since the directory was last published five years ago.

In addition, listings show that the movement is broad-based both geographically and demographically:

• Five East Coast states—Maryland (13), Massachusetts (19), New Jersey (12), New York (39), and Pennsylvania (24)—contain 25 percent of the groups. Three West Coast states—California (58), Oregon (10), and Washington (7)—contain 17.5 percent of all groups. Texas, with 26 organizations listed, and Michigan, with 21, seem to be atypical of the rest of the country, where state and local groups are fewer, but are fairly evenly distributed.

• There are 53 listings for Gray Panther groups, which represent older persons; 34 listings for Public Interest Research Groups on college campuses; 15 chapters of the Association of Community Organizations for Reform Now, which represent low income individuals; 30 Citizen Action groups; and 10 consumers leagues.

• While not all organizations listed have members, those that do reported over two million individual memberships.

The groups reported involvement in more than 300 specific issues, most of which fit under the rubric of health care, the environment, housing, consumer rights, and utilities.

When compared to earlier editions, the directory reveals that many organizations have shifted their priorities from those perceived as traditional consumer issues, such as automobile lemon laws, to broaderbased concerns, such as access to health care and advocacy for the homeless, affecting often unrepresented members of the community.

Copies are available for \$5 from CFA, 1424 16th Street, N.W., Suite 604, Washington, D.C. 20036.

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