

sale” signs, and signs warning of safety hazards.¹⁵³⁵ Prohibiting homeowners from displaying political, religious, or personal messages on their own property entirely foreclosed “a venerable means of communication that is unique and important,” and that is “an unusually cheap form of communication” without viable alternatives for many residents.¹⁵³⁶ The ban was thus reminiscent of total bans on leafleting, distribution of literature, and door-to-door solicitation that the Court had struck down in the 1930s and 1940s. The prohibition in *Vincent* was distinguished as not removing a “uniquely valuable or important mode of communication,” and as not impairing citizens’ ability to communicate.¹⁵³⁷

Sound Trucks, Noise.—Physical disruption may occur by other means than the presence of large numbers of demonstrators. For example, the use of sound trucks to convey a message on the streets may disrupt the public peace and may disturb the privacy of persons off the streets. The cases, however, afford little basis for a general statement of constitutional principle. *Saia v. New York*,¹⁵³⁸ while it spoke of “loud-speakers as today indispensable instruments of effective public speech,” held only that a particular prior licensing system was void. A five-to-four majority upheld a statute in *Kovacs v. Cooper*,¹⁵³⁹ which was ambiguous with regard to whether all sound trucks were banned or only “loud and raucous” trucks and which the state court had interpreted as having the latter meaning. In another case, the Court upheld an antinoise ordinance which the state courts had interpreted narrowly to bar only noise that actually or immediately threatened to disrupt normal school activity during school hours.¹⁵⁴⁰ But the Court was careful to tie its ruling to the principle that the particular requirements of education necessitated observance of rules designed to preserve the school environment.¹⁵⁴¹ More recently, reaffirming that government has “a substantial interest in protecting its citizens from unwelcome noise,” the Court applied time, place, and manner analysis to uphold New York City’s sound amplification guidelines designed to prevent excessive noise and assure sound quality at outdoor concerts in Central Park.¹⁵⁴²

¹⁵³⁵ *City of Ladue v. Gilleo*, 512 U.S. 43 (1994).

¹⁵³⁶ 512 U.S. at 54, 57.

¹⁵³⁷ 512 U.S. at 54. The city’s legitimate interest in reducing visual clutter could be addressed by “more temperate” measures, the Court suggested. *Id.* at 58.

¹⁵³⁸ 334 U.S. 558, 561 (1948).

¹⁵³⁹ 336 U.S. 77 (1949).

¹⁵⁴⁰ *Grayned v. City of Rockford*, 408 U.S. 104 (1972).

¹⁵⁴¹ 408 U.S. at 117. Citing *Saia* and *Kovacs* as examples of reasonable time, place, and manner regulation, the Court observed: “If overamplified loudspeakers assault the citizenry, government may turn them down.” *Id.* at 116.

¹⁵⁴² *Ward v. Rock Against Racism*, 491 U.S. 781 (1989).