risen to almost twice as many as NISS counted when it completed its analysis. In major markets, television is looking more like radio every day.

The Commission should use the opportunity of this Inquiry to revisit the "option time" prohibition for stations in the largest markets. OPP found all the Commission's network-affiliate restrictions were "ripe for reexamination", but, in particular, the "option time" rule bears little relevancy to the current relationship between a network and its Top 50 affiliates, and no relevancy to the competitive situation in the large station markets of the 1990's. Under these circumstances, the Commission must determine whether this antiquated rule fosters, rather than hinders, attainment of any of its policy goals.

V. CONCLUSION

The momentous changes that have occurred in the television broadcast industry, and the decline in the competitive position of television networks and stations those changes have caused, have undermined the validity of the premises on which the Commission's television rules are based. The need for deregulation is urgent if broadcasting is to compete successfully in the 1990's, and there is no reason why

the Commission should not be able to put its review of these restrictions on the fastest possible track. The record supporting repeal or substantial modification of many of these rules is already established; for others the Commission should promptly commence a proceeding to compile the necessary record. The future of free, over-the-air television depends on this Commission's ability to act with deliberate speed to rid this country's broadcast industry of outdated regulations that only serve to lessen its ability to compete and serve the public.

Respectfully submitted,

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