

Federal Communications Commission
445 12th Street SW, Washington, DC 20554

MB Docket No. 18-349

May 27, 2019

To the Honorable Federal Communications Members:

My name is Howard Reynolds, Native Houstonian and veteran broadcaster of thirty seven years in radio and thirty years in television production. My purpose in contacting you is to open discussion on amendments to the "Telecommunications Act of 1996" Known here in as "Telcom 96" More specifically section 202 regarding radio station ownership. Upon the passage of Telcom 96, section 202 relaxed the limit of how many radio stations could be owned by one individual or corporation. The effect of this relaxation created the largest buy out of radio stations by media corporations in U.S. history. Resulting in the establishment of the large media corporations we have today. An undesirable side effect of this environment was and continues to be the loss of thousands of broadcasting jobs and local programming on radio stations. A great many of these corporate owned and operated radio stations have no local programming at all. Through the use of large computer networks, the local broadcaster has been replaced by syndicated programming and out of market voice trackers. A means by which the owner operators save money and put the local broadcaster out of work.

Without the guardian of federal regulation many of these media corporations overreached their financial abilities to afford ownership of so many radio stations and found themselves deeply in debt. This further increased the use of automation systems and endless syndicated programming further eliminating local broadcasters from their craft. There is an environment of disregard for locally originated programming and a strong focus on the company's bottom line, to the exclusion of anything else. To that end there are very few opportunities for entry level positions or positions for veteran broadcasters.

Large and small radio stations are dependent on license issues through the Federal Communications Commission to operate on the public broadcast spectrum. They do not own the license, it is a privilege granted from the commission. This seems to have been lost in today's broadcast environment. Radio stations were never meant to be used as automatic teller machines for large corporations. After considerable thought I submit to you the following proposals:

1. Term limits be applied to a federal license for operating on the public spectrum. A limit of Twenty years on the license granted to a broadcast company with a five year renewal process.
2. A limit of four hours of the broadcast day may be used for syndicated programming. The remainder of the broadcast day must be locally originated programming. In markets below One million citizens, six hours of a broadcast day may be used for syndication. The remainder of the broadcast day must be locally originated programming. These decisions can be left to the operator's choice.

In discussion of point number one, a twenty year term limit on a federal license will create new companies for these licenses and also create a new and diverse landscape. It's intent is to give more would be broadcasters opportunities, and end the monopolizing of the public airwaves by a hand full of companies. To address micro markets where only one operator has interest, no term limit will be imposed. To address public radio station license holders at the lower end of the FM spectrum, licenses held by colleges and education institutions where there is only one operator available, no term limit will be imposed. All others where more than one college or educational institution are present will be affected by the term limit.

In discussion of point number two, a requirement for local programming be put in place. This will effectively end the continuous use syndication as a program source to the exclusion of local originated programming. This requirement will restore thousands of broadcast jobs lost due to automation systems. This local and live amendment to Telcom 96 brings back the local broadcaster.

In closing, the passage of the Telcom 96 act created an environment that encouraged financial overreach by media companies by trying to buy every radio station on the spectrum. It's unintended consequence was, and continues today to narrow radio programming and force local broadcasters out of employment. It's final effect has created bland and endless syndication and an unprecedented loss of opportunities for the local broadcaster and the radio listener. I cannot believe the original authors of Telcom 96, section 202 regarding radio station ownership could have foreseen the result of the seventeen years of this act. I do not believe that legislation has created the environment for which it was intended. Now is the time to review Telcom 96's effects and performance on the delivery of it's intent. This is where non regulation has failed the local broadcaster and the radio listener. By modifying this law with the suggested amendments, thousands of local broadcasters will be put back to work. New and diverse radio programming will be created. Finally the purpose of this plan is people will be put back to work, and it doesn't have to be funded by the federal system. In an environment where our public officials are seeking to create employment opportunities, this should not be overlooked.

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