BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

**COMMENTS in MEDIA BUREAU DOCKET 17-106**

**Elimination of the requirements of Main Studio Location & Staffing.**

I support the elimination of this Rule. I do not own a station but am an avid listener of my local community radio, WPKN, WSHU, and WNPR. I Listen to many of the mass commercial stations as well.

**My Interaction With Stations**

My preferred method to communicate with a station personality or management is via emailorphone. I never went to the main studio to talk to station personnel. I do not believe that I am unique in this communication preference. as a listener I never had the need for immediate response to a communication of mine. For my needs a 24-hour seven-day-a-week response capability of the station seems to be over sufficient.

**Local Content**

The presence of the Main Studio Rule does not support the inclusion of local content. The inclusion of local content is a programming decision made by the station licensee. A local Civic group can walk into the local main studio and asked to be placed on the air and the licensee can say no. Or the local Civic group can call the programming manager in another state of a national syndicated Network and ask to make a public announcement and the licensee can say yes. The point being that the Main Studio rule in and of itself does not guarantee local content.

If the potential listeners of a local station support the programming then the station will be profitable. profitability is a proxy forassessing if the station is providing content the local community desires. My local community station always says during its fundraising drives that they are here to provide the content that I as a supporter and listener want to hear. In this regard the for profit and the not-for-profit stations are similar in their need to raise revenue to cover their expenses, and will provide the content best suited to its target audience.

The Commission should not begin another rulemaking to acquire a specific amount of local content. the public if they are not satisfied with the programming a station is providing should complain to the commission and the commission should assess these comments at the time of relicensing. it is telling that so few people have ever asked to see the public inspection file for station or file complaint about the content to station is carrying except when that content is socially offensive.

**The Main Studio Rule does not Prevent Consolidation**

It is self-evident that the existence of the main Studio does not prevent consolidation of station licenses. Therefore the elimination of this rule will have no effect on whether consolidation will occur. Consolidation will occur for economic reasons.

**Comment on Telephone Contact**

My comment on the proposed telephone contact requirements is the commission should allow the greatest flexibility for local stations to either establish a call center for their own station or to participate in a Consolidated call center at a remote location servicing multiple stations. The avoidancd toll free numbers in order to maintain the illusion of a local Exchange is not an effective use of the rulemaking process. Centralized call center operations are very capable of providing customize support for multiple clients.

**Where the Local Radio Transmitter is part of Emergency Response and Resilience Strategy**

The rulemaking refers to the Minot South Dakota incident. I believe it's referring to the fertilizer train derailment in the year 2002. the local station was staffed that night by an individual and still the response by Public Safety was less than satisfactory. the lesson from that incident should be the required testing of the emergency alert system and thorough training by Public Safety officials, for example police and fire, two utilize the alert system to issue alerts and inform the public. To the commission's credit over the past 15 years it has taken strong steps to strengthen the reliability and effectiveness of the emergency alert system.

During the development of an emergency all forms of communication, wired and wireless telecommunication, radio, television, and the internet will all be accessed by citizens seeking immediate information. The Main Studio Rule obligation to staff a studio and single phone line will not be adequate to satisfy this communication requirement during an emergency.

Thank you for considering these comments.

Jonathan Appelbaum