

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

<b>Notice of Proposed Rulemaking</b>	) <b>FCC 17-59</b>
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<b>Main Studio Rule</b>	) <b>MB Docket No. 17-106</b>
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<b>Proposed Rule Changes to CFR-47, Part 73</b>	)
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**Comments of McCarthy Radio Enterprises, Inc.**

1) McCarthy Radio Enterprises, Incorporated (“MRE”) and it’s principal Michael G. McCarthy, CSRE, CEA hereby respectfully submit it’s comments to the Notice of Proposed Rulemaking in the above captioned proceeding. The notice seeks comments on proposed modification of the rules regarding the “Main Studio” requirements of Part 73 broadcast radio and television licensees.

2) MRE is a professional contracting technical services provider to the broadcast industry and it’s allied fields based in Woodridge, (Chicago), IL. MRE’s principal has over 30 years in the field of professional broadcast technical services and allied fields. Mssr. McCarthy is certified by the Society of Broadcast Engineers (SBE) as a Senior Radio Engineer and Audio Engineer and is a member of the Institute of Electrical and Electronics Engineers (IEEE). He has planned, built, and maintains AM and FM facilities in markets of varying sizes from unrated to major. The comments offered herein are those of Mssr. McCarthy and MRE exclusively and do not in any way reflect, represent, express, or infer the opinions, positions, or preferences of his licensee clients or employers in this matter before the Commission.

3) The Commission in the instant matter is finally acknowledging the time for a new direction by accepting certain rules and regulations no longer reflect contemporary business and societal conditions. Today, the regulatory “Main Studio” is contemporarily at odds with the context of the rule’s original intent. When the rule was first crafted in the early days of broadcasting, the principal operating offices and studios were located in the community of license, and by necessity close to or with the transmitter. Their existence in the community was considered a “pillar” as it was the community’s connection to the world at large with the newspaper and magazines. Fast forward 80 years and that condition is no longer the case. Thus rules to be adopted in the instant proceeding need to reflect present day technical as well as societal and business operations and where many hats are worn by staff in typical broadcast operations, station or market size notwithstanding. The regulatory “Main Studio Rule” (CFR47-73.1125) is one such regulation in need of a modernizing overhaul.

4) MRE generally supports and concurs with the Commission’s review and contemplated modification of the regulatory “Main Studio Rule”. However, MRE does not support outright deletion. While society’s mushrooming predisposition of intermediary non-linear technology in lieu of personal “linear” voice telephone calls and/or face to face visitation has substantially derailed the well intentioned role and mission of the as-defined and current “Main Studio” of in-person engagement, it has not completely eliminated such a need. Never the less, the present regulatory Main Studio siting in the context and spirit of the rule is now outdated, excessively burdensome to continue foisting upon licensees, and must change. The changes needs to reflect present day reality of non-personal communications, but should not completely exclude the part of the public which doesn’t have ready access to social media or generally to the internet. Nor should it allow licensees the ability to vacate their responsibility to the community of license.

5) In the instant proceeding, the Commission has asked a number of questions relevant to assessing the burden on licensees. MRE has been involved in several situations which involved clustering of widely spaced stations together into a common location for scales of economy. Part of the mission included the creation of credible “Main Studios” to meet the letter, if not the spirit of the rule for those stations whose studios and offices were to be located outside the permitted

distances in the current rule. Generally speaking the first challenge encountered is to find a suitable location where to house the regulatory Main Studio. Such is not an easy or simple task in rural areas and presents a significant logistical and time consuming burden to the licensee. More often than not, the “Main Studio” is ultimately sited in an ongoing local business with existing staff. Often, these local business operations have little, if any relationship to broadcasting. In other instances, we have been able to find a willing fellow broadcaster in the same or closely located town to rent/host the regulatory “Main Studio” and provide a studio for that function. In those cases, licensees have assigned production staff for tasks which can be performed at that location and gave them a management title. These collaborating broadcasters welcome the added income and are already familiar with the Commission’s rules. Never the less, if the hosting broadcaster becomes a format competitor or a feud develops, that option disintegrates quickly leaving the tenant licensee on the street and a difficult position.

6) In most cases where stations whose present rule regulatory Main Studio is in an unrelated business or other station functions are not executed, compulsory managerial and staff titles are simply overlaid on existing multi-tasked employees of the hosting business. They are also equipped with an absolute minimum equipment compliment designed to only to meet the letter of the rule to “maintain continuous program transmission”. Such equipment is often an older retired/surplus computer, a pair of DVD players, a mini-mixer or switcher, phone hybrid, graphics generator, camera, along with a microphone and EAS equipment. While such could be a “last resort” facility, rarely, if ever, would it ever go on the air except to maybe test over night.

7) Ongoing costs to create a credible “Main Studio” are a significant cost center for licensees. Aside from the wholly burdensome management staffing requirement which can exceed \$60K a year for credible staffing, operational costs for rent, utilities, local phone line, office equipment, web access for EAS, program transmission facilities, and associated maintenance labor account for what could be as much as \$1000-2000/mo. beyond the aforementioned staffing costs. For small market operators, and most specifically singleton and small combo operations, that \$6-8K/mo. is a significant percentage of their total cost of operation and results in cost reductions elsewhere. Often times that first elimination is local program content

such as local news and other local sources of programming and content through reductions of staff. Decisions of this magnitude is a terrible sacrifice to meet what is arguably an arbitrarily tight distance regulation.

8) MRE will not dispute and in fact concurs with the well agreed to and established public in-person visitation of Part 73 licensed broadcast facilities is few and far between. Such visitation has historically been sporadic except in situations where a specific prominent issue or matter involving the license is before the public. Such as a controversial political election and/or candidates on-air comments. In Mssr. McCarthy's 30 year professional career, he can count on one hand the number of in-person public walk-in visitations that he's aware to discuss station programming with radio licensee representatives. More pointedly, he is not aware of any in-person visits to radio stations he maintains in the past 10 years for the principal reason underlying the Main Studio rule's existence: Public engagement. More over, the same experience applies to Public File inspections. The relocation of the Public File to the FCC's web page is a natural progression in unburdening stations and their employees allowing them to focus on programming matters relevant to the community and engagement via contemporary tools of social media, e-mail, texting, and/or other non-linear forms of communication. Such are the modes of engagement by station staff that personal visitation is no longer a meritorious reason for the regulatory Main Studio.

9) As the Commission notes in Para 1 of this proceeding, such modes of communication are a complete reversal of fixed linear in-person and voice telecommunication roles. Mssr. McCarthy has since watched the migration of the public's engagement with licensees since 2005 explode via non-linear social media and other means of non-in-person or real (linear) communication. The world, and more specifically telecommunications, has undergone a complete transformation and renaissance since the "Main Studio" rule was last revisited in 2002. At which time, e-mail was the only form of non-linear communications beyond facsimile, postal mail, courier, and voice mail/recorded message. Such reference to the changes since then would include the cited Public File migration to an on-line version as opposed to the time and space consuming physical presence in the regulatory Main Studio. In the contemporary world of e-mail, texting, and

social media (non-linear or time shifted) communications, the dated mindset embodied in the current “Main Studio Rule” is completely at odds with 2017 day to day mobile centric life. And even more so going forward with greater non-linear, non-real time mobile/portable, and decreasing direct person to person communications.

10) Moreover, the traditional phone is no longer the leading means to contact licensee staff for any reason, including emergency message dissemination. Such non-linear engagement (such as IPAWS/EAS/CAP) is more swift, concise, automatic, and occupies station staff in ways not conceivable when this rule was last modified.

11) And further, the increase in social media and non-linear electronic communications modes has seen linear modes such as traditional telephone use decrease precipitously to the point stations landline phone use is no longer the primary means used for business. Linear real-time phone lines are now more for on-air studio calls or other technical operations than day to day business communications, let alone engage with the public on matters of programming. And further still, the various local phone service providers are in the process of sunsetting local “POTS” telephone service as it is known and local phone service will become a memory.

12) With the above thoughts in mind, **station staff and management where they choose are generally already more engaged with it’s listeners and the public through non-linear communications methods than ever before in the history of broadcasting.** Through social media, individual specific electronic communications, and station web-pages, licensees, station management and programmers are more engaged with listeners and the public at large through their keyboard and finger tips. Not necessarily with their voices or the hand shake as has been the case in generations prior to today. Never the less, there are licensees who are not so engaged and are ignorant of their listening or viewing public’s interests.

12) A strong statement to the state of today’s licensee’s engagement? Yes, indeed. Broadcasting is no longer the Main St. retail “store” front next to the five and dime, diner/soda fountain, and granite columned bank, and hair salon. Broadcasters for the most part are today

engaging in manners and methods not contemplated when the rule was last adjusted in 2002 to allow the 25 mile/city grade contour ring, never mind the 1970's when the rule was last substantively modified. That was a time where most radio broadcasters still used analog program loops, and equipment operated with vacuum tubes or, rudimentary by today's standards, discrete 1<sup>st</sup> or 2<sup>nd</sup> generation solid state devices. Never mind AC synchronous turntable motors driven by intermediate hard rubber "pucks" playing cue burned 45's as the primary direct to air media before carts were ubiquitously available. Or TV stations which still used film on newscasts, video tape was 2" quad, again with vacuum tube circuits, and satellite distribution was cutting edge limited to network feeds. And where broadcasters logged meter readings every 30 minutes. Such time was also when telecommunication consisted of relay driven PBX and key switch units, the thermal paper facsimile machine was state of the art, the internet was in it's embryonic stages, micro-computers saw their operating systems loaded by acoustic coupler from cassettes, and social media (texting, Facebook, Twitter, RSS feeds, et al.) were more than a generation away from conception.

13) The above comments notwithstanding, there remain select and limited scenarios where in-person and/or real-time phone engagement still remains relevant. Such as with members of the public who do not have access to broadband, are disabled and are unable to communicate except as by phone, or simple preference to meet in person. Demographically, this would generally apply to older people who may not be technically savvy or those members of the public who simply lack the financial resources to subscribe to broadband services. While these classes of the public are a declining minority, they remain for the time being a sizable percentage never the less. It is for this reason some measure of personal contact by in-person or real time phone should be kept in place for those members of the public to reach the licensee and it's staff without undue burden to either party. The challenge is to define precisely the requirements of sustaining such facilities. Commissioner Clyburn expresses this same sentiment in her public statement on the matter.

14) There also remains a need for the public to reach the station staff where non-linear/dispersal communications would be an inappropriate mode or simply untimely. Again, Commissioner Clyburn expresses the thoughts on such scenarios in her public statement on the

matter. The challenge is to craft a durable, yet flexible standard on which to base the next generation rule defining the licensee's obligation to sustain accessibility by the listening public. To meet the public's ongoing convenience, interests, and necessities while not imposing a costly burden on the licensee. But how?

15) MRE believes first that outright *elimination of the Main Studio Rule will allow scores of licensees to abandon their communities* to consolidated regional office(s) and/or studio centers, third party technical, network operating, or data centers. The licensees would leave nothing more than a tower and transmitter serving the community of license. Such physical consolidation will result in the mass robo-ization of programming with de-localization of content and an abandonment of overall local engagement. This can be readily seen on any number of reserved band radio stations operating with main studio waivers who originate programming from a single studio facility and transmit a single stream to every transmitter in their domain. This mode of programming with zero engagement from the local community is at odds with the very premise of broadcasters being a public trustee.

16) MRE believes maintaining a regulatory "Main Studio", however with a very different recognition and definition of what constitutes a broadcast "Main Studio" would serve the public more forthrightly than the current rule. By maintaining a compulsory studio requirement in regional proximity of the community of license, it's function, purpose, and subsequent duties and obligations will at least continue to bind a station to the community it is obligated to serve as a public trustee per the Communications Acts. This trust has been summarily and routinely discarded as group licensees continue to increase their reach and breadth of coverage of what is a singular message not necessarily reflective of the community's contemporary interests, needs, or conveniences.

17) Para 5 of the instant NPRM references the 2015 AM revitalization and comments sought on this very subject. MRE commented in the AM Revitalization NPRM that we felt an increase to a 75 mile radius to site a "Main Studio" would offer relief to singleton or small operations to allow licensees the ability to obtain scales of economy while maintaining some

measure of presence in the region. We specifically didn't suggest elimination of the Main Studio then as it was not offered as a viable option in the context of that yet still open proceeding. We have decided to not change that position in the instant proceeding and offer the following recommendations to modernize the Main Studio Rule.

**Recommendations:**

**Local Presence-New "Main Studio":**

18) While many licensees continue to operate station business offices in local communities that include a "studio", actual content production and operating studios are increasingly clustered into operation centers some distance from the community of license. In fact, technology which has been around for some time allows contemporary studio operations to be anywhere in relation to a given station's transmitter. Broadly speaking, listeners will generally not notice anything unless there is a mis-pronounced word or the announcer's accent is distinctly different than local dialect.

19) The argument is content relevant to listener's lives is what matters whereas the origination location doesn't. From a pure programming perspective, it is simply those words and images which impact the listeners/viewers in a given community and it is technically irrelevant where the words are physically spoken and the images created. That is a fair argument to make and MRE concurs with the premise. And the purpose of the regulatory "Main Studio" in this context and present day technology is rendered moot and ineffectual as a result.

20) More over, the regulatory Main Studio in the context of the current rule as referenced in Para 9 is as result a meaningless hollow shell. With the above in mind, MRE believes the continued requirement of mere continuous program transmission carries little weight, offers little value, and is simply a diversion of necessary funds and energies away from better operating the station(s) from their true operating studios.



21) MRE still maintains however, a local presence of some form is a duty to which the broadcast licensee owes the public as a trustee of the spectrum for which they're licensed. The public's only option for those licensees who simply close up their local offices and studio would be faceless non-linear messaging portal with no certainty their message would be seen or heard. This is contrary to the spirit and intent of the entire premise where the broadcaster is a trustee of the public's airwaves. The challenge is how to satisfactorily meet that goal without creating an undue and costly burden on the licensee.

22) As such, MRE believes a new definition of the "Main Studio" as the *principal location of content production and dissemination to the transmitter* should be adopted and employed for all stations. And that the Main Studio in this context be located within 75 miles of the community of license. Such definition would not include any reference to business office operations or staffing. MRE has coincidentally observed that where operating studios are located, a business operation with some managerial presence of some measure is usually co-located. So by it's nature, licensee representatives will be present by default at those facilities.

23) The as-proposed 75 mile radius would maintain a reasonable balance of public "access" and of a connection to the listening public while allowing clustered operations in an economy scaled location offering an increased variety of suitable locations, along with an enhanced pool of employee talent and skillsets along with their retention.

24) Such would also prohibit mega-licensees from consolidating and aggregating dozens or hundreds of stations from all corners of the country and possessions into a single datacenter/studio warehouse some hundreds or thousands of miles from any given community of license. As prior noted, this already is a practice employed by several very large licensees in the reserved band where all their content is originated in a single studio complex located hundreds, if not thousands of miles from a given community of license and where there are no local representatives present to address local programming concerns either by linear or non-linear communications. These licensees routinely seek and are given waivers to the Main Studio rule. This is wrong and flies in the face of the Communications Act stated mission.

25) More over, a balance is needed to insure the licensee remains connected with their community and not focus exclusively on a market's dominating city some great distance from the community of license. It is for this reason, MRE believes that 75 miles be employed regardless of the number of co-located station operations or market size.

26) MRE settled on the 75 mile radius as a balance which will allow an increasingly mobile public a reasonable distance to travel should they find it necessary to personally engage the licensee. However, it allows the licensee some measure of flexibility to site the Main Studio in a location where access to scales of economy of employee candidates pool, professional services, and other necessities of operating a business are more plentiful, let alone available.

**Local Presence-Overall Staffing:**

27) MRE agrees the existing full time and on-site managerial staffing requirement at the existing regulatory "Main Studio" is outdated, excessively burdensome and should be deleted. While staffing is naturally a part of any operating studio facility, it should however be the licensee's discretion whether they hire full time, part time, contract, or engage other managerial and staffing arrangements to sustain their facilities both in the office and studios. As such, the above suggested change of the Main Studio as the principal point of content origination will by default eliminate the necessity by rule of a full time managerial presence. Again, such staffing decisions should be left to the licensee.

**Local Presence-Local Phone Number:**

28) MRE generally agrees a working phone number to reach station staff is essential to both the operation of the station and the public's desire to contact the station. And we agree a local or non-toll number in the community of license is generally preferred. MRE feels, however, it's no longer necessary to require and maintain such a local number. The cost for local numbers where contracted pricing discounts are not available is approaching \$100/mo./per studio location

after all taxes and local surcharges are factored. For a little used phone number except for inbound calls, that's a significant cost center for licensees big and small.

29) Additionally, a specific challenge relates to ongoing Local Exchange Carriers (LEC) attempts to sunset classic wireline Plain Old Telephone Service (POTS) as is now ubiquitously in place across the country in the next 10 years. What does a licensee do when the LEC sunsets POTS or it's circuit switched peer services? MRE believes sunseting POTS service as we know it will first occur in small markets and towns where the costs to maintain such service is highest. Thus making it even more challenging for financially strapped small market stations to maintain communications with their listeners.

30) Remote call forwarding or foreign exchange service is also growing more costly as well placing increased burdens on licensees who operate multiple stations across state lines or local area tariffs (LATA) and where local service doesn't extend across that state or LATA line. These too are costly services imposed on licensees where it is no long necessary or relevant to a station's operation.

31) MRE proposes allowing licensees operating multiple stations in co-located main studio offices and studios to publicize a single business phone number regardless of location or proximity to the station's community of license. This will allow the licensee the ability to unify marketing of the clustered station and eliminate public confusion as to which business/station they might be calling.

32) In support of the above, most cellular, VoIP, and some local landline services include long distance with the basic service. As such, toll charges incurred by the caller are no longer a factor. Where toll charges are incurred where the calling party still has classic/legacy POTS services with metered toll calling, the cost of long distance has significantly dropped compared of those in effect the rule was last modified. Compared to today's rates, long distance charges were often an order of magnitude higher relative to contemporary personal incomes. Long distance/toll calling is no longer a burden on the public to absorb brief contact calls to broadcast stations.

33) Also while toll-free "800-WATS " service is an option, service providers do not offer or provide filters to limit incoming chargeable calls to the recipient, in this case, the licensee, from central offices and/or area codes beyond what would be the local calling area of the licensee's community (or communities) of license. Thus while the toll-free service satisfies the non-toll requirement to the caller, it also carries a potentially more significant cost burden to licensees than multiple local numbers. Never mind 800/WATS service number not provided by the LEC are rarely obtainable through local directory White Pages.

### **Local Presence: Local Directory Listing**

34) The White Pages published by the LEC as we know it is also under threat. Many are now becoming regional only directories covering multiple counties. And they often are not circulated to everyone in the community by default. If a customer in fact wants a printed directory, they need to call in the request to the LEC or their directory contractor. More over, there is often a charge for the printed directory. Never mind errors in the listing are challenging to correct.

35) Such listing is already confusing and difficult to achieve given how the directory search engines operate. Moreover, it's a challenge to coordinate listing the station or licensee's primary phone numbers provided by non-LEC carriers on the "official" White Pages directory. And still further, many times these directory services will not provide them when called. Never mind calls to directory assistance are an exceptionally costly burden to the caller for something which they will likely receive the wrong or no information for which they seek. Changes to the listing also present a significant burden if there is an error, when call letters change, or when a station moves. As such, the logistical hoops a licensee must hop through to properly list a station, let alone multiple stations in a local directory is unnecessarily burdensome. MRE strongly recommends the Commission rescind the White Pages listing along with the local number requirement.

36) Instead, MRE believes a requirement of posting the licensee/station office phone number, the as-proposed Main Studio street address, any contact e-mails, and other social media contacts ***prominently and clearly at the top of the station's front webpage***. Additionally, the same information should be located where it is also closely associates with the Public File icon. Such should be sufficient publication outreach in lieu of local directory listing(s) for each station regardless of location or clustering. Moreover, both the public number ***and*** associated social media contacts as well as the as-proposed regulatory Main Studio street address should also be clearly visible on the stations FCC Public File front page.

37) MRE also believes the single office phone number for business purposes eliminates confusion by the public and allows a unified public presence to the total business of the licensee.

38) Where stations do not employ a web page at present, MRE believes stations should at minimum be compelled to operate a simple single web page for the sole purpose of providing contact information and pointing to the FCC Public File page. MRE does not believe that to be an excessive burden to licensees to maintain a station domain name and create a simple page to show their contact information in place of the legacy White Pages listing.

#### **Local Presence-Accessibility to Station Staff:**

39) MRE believes requiring a human be accessible through the phone at all times, including off hours, to be burdensome and unnecessary. More over, emergency communications are best handled through established channels and means. Not by any ad-hoc or “wild-cat” communications. This would include the use of EAS and collaboration with local authorities on such matters. And such collaboration would coordinated in advance.

40) With regards to off hours contacts, there are questions as to whether hourly non-exempt employees who would be on-call for after-hours contacts might be entitled to overtime or additional hourly pay for answering calls. This would prove to be a challenge to manage and potentially become a significant cost and logistics burden should the public realize there is an all-

hours human answered number. For high profile stations, the public would quickly proceed to abuse such a resource should it be mandated and render moot it's effectiveness. Never mind the robo-calls which would surely ensue. While an answering service could also fill and buffer this role, it is again ripe for abuse and an unnecessary challenge to manage as well as incur ongoing costs. As such, we feel a simple voice mail box with top level auto-attendant instruction would be sufficient.

41) MRE believes that access to staff using existing contemporary means or those proposed above is sufficient for typical public interaction. Except in instances where the licensee has decidedly abdicated their responsibility to the local community and it's public, most licensees recognize the importance of listener and public engagement. What to do with those licensees who abdicate their responsibility to engage with the listening public is an open matter which may be the premise for an additional proceeding or enforcement action.

42) Never the less, MRE believes a listener/viewer voice mail box should be at minimum a top level option for any auto-attended phone system employed by the licensee for accepting calls from the public. Selection of the voice mailbox by the caller based on auto-attendant direction would limit or eliminate the leaving of messages by computer generated tele-marketers and related "robo-calls."

43) We are hesitant to suggest a requirement for publically listing personal e-mail accounts given the logistical burden of sorting through countless "bot collected" SPAM messages which would be sent to that most public of accounts. As such, MRE believes that decision should be left to the licensee on how to best craft those communications with the public. The same should apply with any of the various social media services available as well.

44) As prior mentioned, there are those members of the listening or viewing public who do not have access to the internet or are otherwise unable to use the internet. While the former is a declining percentage of the public universe, the latter is not so readily declining. Persons with disabilities who are unable to use the resources of the internet are at a double disadvantage. MRE understands this paradox between wishing to see all things go to the web and not everyone having

access to able to use the web. As such, there remains a need to sustain some form of communications to meet the minority of the public unable to access or use the internet. It is for this reason, MRE believes the continued requirement of a standard landline phone line, voice mail, and provisioned as suggested above along with a physical presence of some kind be maintained within 75 miles for these equally important listeners and viewers .

### **Local Presence-Emergency Messaging/EAS**

45) In Para 10, the comment is made about the ability to see licensees receive time sensitive emergency information during non-business hours. Is that not the purpose of an automated IPAWS/CAP/EAS system? In the event a licensee wishes to have engagement with local authority (ies) having jurisdiction (AHJ) after hours for emergency and other significant communications intended for the public, that is an option for the licensee under Part 11 to coordinate through the LECC. Such would also be an obligation best imposed by the local AHJ's as a condition to operate under local business licensing. Some best decided at the local level.

46) The complete elimination of the regulatory Main Studio would in effect neuter many AHJ's ability to engage with the licensee at a time when FEMA is attempting to broaden the use of CAP for local message relay.

47) Broadly however, local message dissemination is a thinly veiled concern for the Commission given the Commission's well established mindset that it is only interested in regulating the relay of federally originated messages. And further, the Commission has stated in the past state and local AHJ's should coordinate non-federal emergency message dissemination efforts, then forward to the media for voluntary forwarding or reporting. If the Commission is so interested in the relay of emergency messages from all levels of government, such interest should be given proper attention by maintaining some manner of local presence. More over, the matter should also be uniformly addressed in Part 11 and as a separate omnibus proceeding concerning local message dissemination.

48) This matter will be in part rendered moot when ASTC 3.0 and its embedded EAS fields are turned up over the next three years. Further automating relay of EAS messages through the dedicated fields within ASTC 3.0 would take the human wild card element out of highly time sensitive emergency message dissemination during times where stations are generally unmanned, such as overnights, or overwhelmed from public calls and inquiries. That is in part the purpose of an automated Emergency Alert System, is it not? In any event, Para 10's implied proposal seeks a double standard which will only confuse licensees of their obligations.

### **Conclusion**

49) MRE generally applauds the Commission for recognizing the need to modify the long dated and archaic "Main Studio Rule". However, a balance needs to be struck between the public's convenience, interest, and necessity and the licensee's goal to maximize profits, minimize expenses, and where all other matters are immaterial to that goal and the detriment of the listening and viewing public of the community of license at large. MRE hopes the comments contained herein maintain the balance of public/listener/viewer interests with those of the licensee.

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