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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

May 7, 1993

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

Re: Children's Television Programming
MM Docket No. 93-48

Dear Ms. Searcy:

Transmitted herewith, on behalf of Associated Broadcasters,

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Policies and Rules Concerning Children's Television Programming	)	MM Docket No. 93-48
	)	
Revision of Programming Policies for Television Broadcast Stations	)	

Directed to: The Commission

COMMENTS OF ASSOCIATED BROADCASTERS, INC. AND GALLOWAY MEDIA, INC.

Associated Broadcasters, Inc. ("Associated") and Galloway Media, Inc. ("Galloway Media"), by their attorneys, hereby respectfully submit the attached comments with regard to the Commission's Notice of Inquiry, 8 FCC Rcd 1841 (1993), in the above-captioned proceeding. Associated is the licensee of Stations KVEO(TV), Brownsville, Texas; KPEJ(TV), Odessa, Texas; and KWKT(TV), Waco, Texas. Galloway Media is the licensee of WGMB(TV), Baton Rouge, Louisiana. The attached comments set forth the views of Associated and Galloway Media with regard to the Commission's proposed revision of children's programming policies for television broadcast stations.

Respectfully submitted,

ASSOCIATED BROADCASTERS, INC.
GALLOWAY MEDIA, INC.

By: Anne Goodwin Crump
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May 7, 1993
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COMMENTS OF
ASSOCIATED BROADCASTERS, INC. AND GALLOWAY MEDIA, INC.

Associated Broadcasters, Inc. ("Associated") and Galloway Media, Inc. ("Galloway Media") hereby submit the following comments in response to the Commission's Notice of Inquiry, released March 2, 1993, with regard to policies and rules concerning children's television programming. Associated is the licensee of three television stations: KVEO(TV), Brownsville, Texas; KPEJ(TV), Odessa, Texas; and KWKT(TV), Waco, Texas.

programs of one-half hour or greater in length. We believe that this approach not only is unfair to commercial broadcasters but also would run contrary to the goal of the Children's Television Act to expand the quantity of educational and informational program available for children.

3. When the Children's Television Act was implemented in 1991, we began to seek out further programming that would have a primarily educational and informational content for children. We discovered, however, that very few programs with a primary emphasis on educational or informational content. Since the Commission's policies implementing the Children's Television Act were released in 1991, there has been little real improvement in the availability of such programming. During that period, a few program syndicators have attempted to revive older shows. Some also have attempted to syndicate programs taken off of PBS stations. Neither of these activities actually increases the overall amount of educational and informational programming available to children. Some program producers also have made a weak offering of developmental programs. Most of these new shows are of poor quality, however. Accordingly, a station wishing to provide high quality, standard length educational and informational programming for children has very little from which to choose.

4. In implementing the Children's Television Act, the Commission listed a number of "approved" television programs as examples of educational and informational programming for

children. If a station were to clear one or more of these programs, it possibly would meet the Commission's guidelines for children's programming, but the purpose of the Children's Television Act would not be served. Most of these "approved" shows do not attract large audiences, however. Therefore, a commercial television station, which must generate advertising revenues in order to survive, will place these programs in time periods which are not critical. Because the programs will be placed in unattractive time periods, most children will receive little, if any, benefit from the additional educational programming. Obviously, children can derive nothing from programming which is too inconvenient to watch.

5. Given the realities of the commercial television marketplace, the Commission should not brush aside the educational and informational benefits that can be provided by short-segment programming. Long before the Children's Television Act was adopted and implemented, many stations sought ways to provide more than just entertainment to children. One way in which stations accomplished this goal has been through the use of short vignettes and public service announcements. Such short-segment programming has proven educational and informational value. For example, television has made a tremendous impact with public service announcement campaigns concerning not smoking, drug abuse, child abuse, education, and other problems faced in our communities.

6. Use of short-segment programming also allows for greater

localism in children's programming. Many local stations simply do not have the financial resources to be able to produce a regular, standard-length children's program. Those same stations might, however, have sufficient resources to produce educational and informational vignettes. In these vignettes, stations can feature local personalities, places, and events. Because such segments will focus on matters that are close to the child viewer's home, they are likelier to attract greater interest and attention. Clearly, programming that can attract and hold a child's interest is far more successful in conveying its educational or informational message than programming to which a child does not pay close attention. Further, local programming is better able to provide information about the portion of the child's world that is close at hand and readily accessible for exploration. Thus, localism in children's programming is quite important, and the Commission should encourage local educational and informational programming. As set forth above, in many instances, local programs must take the form of short-segment vignettes or public service announcements.

7. As an example of how short-segment programming may be used to provide educational and informational benefits to children, our stations have instituted "Kids Clubs." One aspect of the Kids Clubs is that children may join and receive monthly magazines. Another aspect, however, is that the stations use the Kids Clubs to reach children with educational and informational programming in a fun environment that will make them more

receptive to the information. The stations each produce local educational and informational vignettes which are interwoven with entertainment programming for children. Before and after each standard-length show, the stations have a local break, from one to two minutes in length. These breaks are comprised of pretaped segments. Under no circumstances is any commercialization allowed. The following are samples of a few of the regular daily segments we air:

- Awesome Achievers - In this segment, we feature a local youngster who has done something noteworthy. We have interviewed and saluted everyone from children who have won spelling bees to children who are bee keepers. These segments have allowed scholarship winners to tell how they achieved success, Eagle Scouts to tell what Scouting has meant to them, and one youngster to tell how he learned CPR and saved a life. The objectives of this program are to foster incentives for peers to strive toward excellence in school and community life through emulation of these role models and to increase children's self-esteem through a reward system that gives children a sense that their efforts count.
- Did You Ever Wonder - In this segment, our Kids Club host answers questions children have sent in to the station. Recent segments have included such things as a tour of a potato chip factory, a visit with an X-ray technician, a visit to a local jail, and a conversation

with a local airline pilot. Whatever the children want to know, we try to answer.

- <u>Readers Are Leaders</u> - In this proposed segment, we will

the educational and informational needs of children, we do not believe that it is the primary mission of commercial television to provide explicitly instructional programming for children. Congress and the Commission created noncommercial educational television to provide that type of service. That educational television has been successful in its efforts is illustrated by the tremendous popularity of such programs as "Barney and Friends" and "Sesame Street." It is not necessary that children be educated every moment that they are watching television. If children or their parents choose that they will watch programming that is primarily educational, such programming is available. If, on the other hand, children or their parents choose that they will watch programming which places shorter educational or informational segments within entertainment programming, that programming also should be available. The commercial and noncommercial television services have different missions, and commercial television should not singled out to perform both.

10. Our stations intend to continue their commitment to meet the educational and informational needs of children through both our programming and our other efforts. We believe that it would be unwise, however, to require stations such as ours to rely almost entirely on standard length programming to demonstrate compliance with the Children's Television Act. This approach would not actually further the goals of the Children's

Television Act, especially in view of the fact that there is a dearth of high quality, explicitly educational children's programming available in the marketplace.

Dated this 7th day of May, 1993.

Clark L. White
Vice-President
Associated Broadcasters, Inc.