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June 25, 1993

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JUN 25 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. Ervin S. Duggan
Commissioner
Federal Communications Commission
1919 M Street, N. W., Room 832
Washington, D. C. 20554

Re: Home Shopping Station Issues

Dear Commissioner Duggan:

From time to time I have read your speeches and pronouncements from Commission releases, and sincerely believe that you are indeed devoted to the public interest - whatever that term may now mean. That your opinion of such things as violence and obscenity coincides with my own but reinforces my support for your views.

Nonetheless, I am no little disturbed at your statement of yesterday postponing Commission action on home shopping issues, and hope that it does not presage your opposition to either a favorable Commission ruling that home shopping television stations in fact operate in the public interest, or that they deserve must carry assistance.

I have made no studies, but suspect that virtually all home shopping stations depend upon it as the sole means of financial support, and should the Commission in effect outlaw it, they would of necessity go dark. Lacking network affiliation and frequently under the guns of powerful network V's, many stations are forced to depend solely on home shopping revenue to survive.

As you well know, Commission rules do not exempt home shopping stations from the public service requirements applicable to all television stations. Home shopping stations must program for children and must put in their public files lists of community issues and programs they have broadcast responsive to them. No exceptions. Given the same public service requirements, for the Commission to conclude that home shopping stations do not serve the public interest, it must decide what is "good" and what is "bad" programming, and may well run afoul of Section 320 of the Communications Act.

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The fact that many cable systems carry cable-only QVC shopping network, but oppose "must carry" for other home shopping organizations not only operates to the competitive prejudice of the other organizations, but also serves to reinforce the contentions of on-the-air television as to the monopolistic practices of cable.

Proponents of violence on television have argued long and loudly that public acceptance and support justify its prevalence. The same justification, i.e., public acceptance, is equally applicable to home shopping broadcasts, the acceptance of which has provided the sole financial means of its continued existence and for the continued operation of television stations broadcasting it.

Yours very truly,

Julian P. Freret

JPF:mf

CC MM Docket 93-8