

donation of airtime. If that occurs, and the NCSA programs are cutback or fail outright, this important information vehicle for state and local agencies and non-profit organizations will be lost and many State Associations will probably not survive. These Associations complement the efforts of the National Association of Broadcasters to foster the best in broadcasting. Their loss will seriously disserve the public interest.

III. CONCLUSION

This is no time to place the television broadcast industry in further jeopardy. The industry is already faced with downward pressure on revenues as a result of the increasingly competitive video marketplace. At the same time, the industry is contemplating the expenditure of millions of dollars in plant upgrading just to try to stay competitive. All this is happening in a rapidly evolving environment where technology and the alliances of program providers and program distributors change daily. The only certainty is uncertainty. This, combined with the constitutional concerns, administrative burdens, anti-competitive effects on advertisers and businesses, detrimental effects on important formats like home shopping, and harmful consequences for the viewing public make the imposition of commercial time or format limitations a truly unwise and dangerous undertaking. The Associations urge the Commission to carefully consider these factors and terminate this proceeding without issuing any proposal for commercial time/format limits. The only action the Commission should take is to issue an

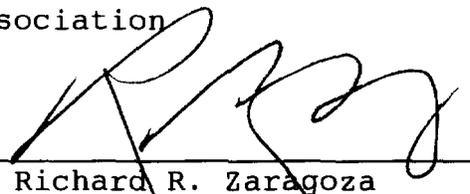
unequivocal statement that it would be fundamentally unwise to reinstate commercial limitations given the strong competition facing free, over-the-air broadcast television, and the potential for serious damage to the goals of program diversity if that industry were jeopardized.

Respectfully submitted,

The Alabama Broadcasters
Association
The Arizona Broadcasters
Association
The California Broadcasters
Association
The Connecticut Broadcasters
Association
The Georgia Association of
Broadcasters
The Illinois Broadcasters
Association
The Kansas Association of
Broadcasters
The Kentucky Broadcasters
Association
The Maryland/District of
Columbia/Delaware
Broadcasters Association
The Minnesota Broadcasters
Association
The Missouri Broadcasters
Association
The Montana Broadcasters
Association
The Nebraska Broadcasters
Association
The New Hampshire Association
of Broadcasters
The New York State
Broadcasters Association
The North Dakota Broadcasters
Association
The Oklahoma Association of
Broadcasters
The Pennsylvania Association
of Broadcasters
The Texas Association of
Broadcasters
The Utah Broadcasters
Association

The Washington State
Association of Broadcasters
The West Virginia Broadcasters
Association, and
The Wisconsin Broadcasters
Association

By:



Richard R. Zaragoza
Scott R. Flick
Sharon L. Tasman

Fisher, Wayland, Cooper
& Leader
1255 23rd Street, N.W.
Suite 800
Washington, D.C. 20037
(202) 659-3494

Dated: December 20, 1993

CERTIFICATE OF SERVICE

I, Susan R. Fisenne, hereby certify that I have this 20th day of December, 1993, caused to be hand delivered copies of the foregoing "Joint Comments of the Named State Broadcaster Associations" to the following:

The Honorable Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

Merrill Spiegel, Esq.
Special Assistant to Chairman Hundt
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

Karen Brinkmann, Esq.
Special Assistant to Chairman Hundt
Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

Commissioner James H. Quello
Federal Communications Commission
1919 M Street, N.W., Room 802
Washington, D.C. 20554

Robert Corn-Revere, Esq.
Legal Advisor to Commissioner Quello
Federal Communications Commission
1919 M Street, N.W., Room 802
Washington, D.C. 20554

Commissioner Andrew C. Barrett
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20554

Byron F. Marchant, Esq.
Legal Advisor to Commissioner Barrett
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20554

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

John C. Hollar, Esq.
Senior Legal Advisory to Commissioner Duggan
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, D.C. 20554


Susan R. Fisenne