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SEP 22 3 36 PM '94

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September 16, 1994

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FCC MAIL ROOM

Mr. Reed Hundt  
Chairman  
Federal Communications Commission  
1919 M Street, N.W. - Suite 814  
Washington, D.C. 20554

Dear Mr. Hundt:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station WCIU, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on my station's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make

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*[Handwritten signature]*

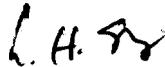
**Mr. Reed Hundt  
Federal Communications Commission  
Washington, D.C. 20554  
Page 2**

**It impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.**

**If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.**

**Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The Commission should not abdicate its responsibility to promote competition. Stations such as my own deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.**

**Very truly yours,**



**Norman H. Shapiro  
Director of Business  
and Legal Affairs**

**NHS:ba**

MASS MEDIA BUREAU

WGTW-TV 48 3900 MAIN STREET, PHILADELPHIA, PA 19127

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OFFICE OF CHIEF  
September 12, 1994

FCC MAIL ROOM



Mr. Roy Stewart, Chief, Mass Media  
Federal Communications Commission  
1919 M Street N.W.  
Room 314 Mass Media  
Washington, D.C. 20554

Dear Mr. Stewart:

I understand that at the October meeting the Commission may consider initiating a proceedings to relax the Prime Time Access Rule. In your deliberation please consider the retention of the "off-network" portion of the rule.

The off-network rule is vitally important to WGTW-TV and is necessary to promote diversity and competition at the local television level. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations like ours will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on our station's ability to finance programming for other dayparts, including local news and public affairs programming.

Each day major changes are taking place in the broadcast industry. Mega mergers between the networks and major program producers appears to be on the horizon. With the three networks poised to enter the off-network and first fun syndication market our station will most likely have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, it is conceivable that the American public will receive all of its programming from a few telecommunications giants. We believe such a result would not be in the public interest.

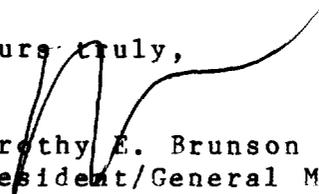
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If the FCC intends to examine this issue, we would hope that it would do a Notice of Inquiry and at the time of initial deliberations not proceed directly to a rule making. Thereby many unresolved and complex issues which have not been discussed on the record would have an opportunity to be heard.

Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from station not affiliate with them. We ask that the Commission continue efforts to promote competition. Stations such as ours deserve a chance to compete. We ask that you proceed with caution and retain the off-network rule so that stations can continue to exist.

Yours truly,

  
Dorothy E. Brunson  
President/General Manager



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Perry A. Sook  
President/General Manager

September 19, 1994

Federal Communications Commission  
1919 M Street, N.W.  
Room 814  
Washington, D.C. 20554

Dear Chairman Reed Hundt:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station KOCB-TV, I strongly urge you retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on my station's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

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**SUPERIOR COMMUNICATIONS OF OKLAHOMA, INC.**

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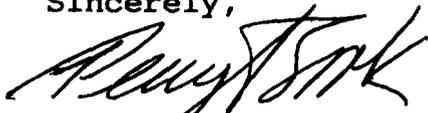
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

September 19, 1994

If the FCC intends to examine this issue, I recommend that it do so in the context of a neutral Notice of Inquiry. At this time the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.

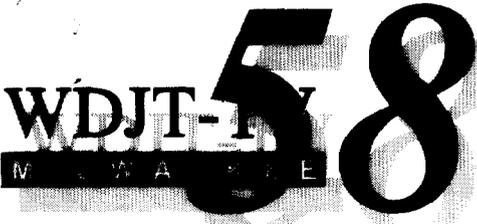
Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. Stations such as my own deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,



Perry A. Sook  
President/General Manager

PAS/rah



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FCC MAIL ROOM

Mr. Reed Hundt  
Chairman  
Federal Communications Commission  
1919 M Street, N.W. - Suite 814  
Washington, D.C. 20554

Dear Mr. Hundt:

I understand that at its October meeting the Federal Communications Commission may be considering looking to relax the Prime Time Access Rule. On behalf of station WDJT, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on my station's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make

it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

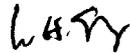
If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.

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**Mr. Reed Hundt  
Federal Communications Commission  
Washington, D.C. 20554  
Page 2**

**Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The Commission should not abdicate its responsibility to promote competition. Stations such as my own deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.**

**Very truly yours,**



**Norman H. Shapiro  
Director of Business  
and Legal Affairs**

**NHS:ba**



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September 12, 1994

Federal Communications Commission  
Office Of Chairman Reed Hundt  
1919 M Street, NW  
Room 814  
Washington, DC 20554

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KUZZ TV 45  
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Tel 805.327.9803

KNIX FM 102.5  
Phoenix, AZ

KC&W AM 1580  
Phoenix, AZ

Dear Chairman Hundt:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station KUZZ, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on my station's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

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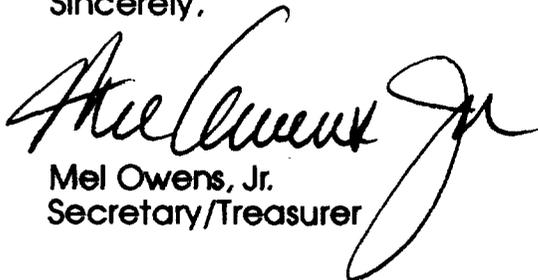
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BUCK OWENS PRODUCTION COMPANY, INC.

If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.

Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The Commission should not abdicate its responsibility to promote competition. Stations such as my own deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,



Mel Owens, Jr.  
Secretary/Treasurer

MO/cm

Suite 300  
10 E. Cambridge  
Circle Drive  
Kansas City  
Kansas 66103

913.621.6262

facsimile  
913.621.4703

**KSMO TV 62**

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FCC MAIL ROOM

Ms. Ruth Dancey  
Confidential Assistant, Rm. 814  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Ms. Dancey:

I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station, KSMO-TV62, strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station and is absolutely necessary to promote diversity and competition in local television markets. In fact, the off-network portion of the Prime Time Access Rule has been instrumental in creating a competitive independent television industry. It is also an essential element in the Commission's long held goal of creating new off-air television networks.

Without the off-network rule, independent stations will have a difficult time securing the rights to top quality off-network programming to air during the access period. This in turn will have a negative impact on KSMO-TV62's ability to finance programming for other dayparts, including local news and public affairs programming.

It is no secret that major changes are taking place in the broadcast industry. Mega mergers between the big three networks and major program producers appear to be on the horizon. With the big three networks poised to enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programming. Eliminating the off-network rule may make it impossible. Without PTAR and the off-network portion of the rule, the American public will receive all of its programming from a few telecommunications giants. Such a result is not in the public interest.

If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. At this time, the FCC should not proceed directly to rule making. There are too many unresolved and complex issues which have not been discussed on the record.

Proposals to eliminate the off-network provision of PTAR will return us to a system where the three major networks can squeeze out independent producers and stifle competition from stations not affiliated with the big three networks. The Commission should not abdicate its responsibility to promote competition. Stations such as KSMO-TV62 deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,

  
  
Jim MacDonald  
V.P./General Manager  
JM/cn

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