

94-123

WLVI-TV 56

75 Morrissey Boulevard  
Boston, Massachusetts  
02125

SEP 19 3 09 PM '94

September 16, 1994

DOCKET FILE COPY ORIGINAL  
fax 617-265-2538

Peter Temple  
VP & General Manager

Office of Chairman Reed Hundt  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

RECEIVED

SEP 19 1994

Dear Chairman Hundt:

FCC MAIL ROOM

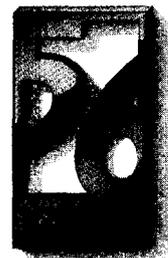
I understand that at its October meeting the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of WLVI-TV, I strongly urge you to retain the "off network" portion of the rule.

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.

There are three strong UHF independent stations in Boston bidding for top quality off-network programming. Without the off-network rule we will have a difficult time securing rights if the VHF network affiliates can air this producer 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. WLVI-TV lost money during the last three years and is now marginally profitable. Relaxation of the rule will ultimately have a detrimental impact on our bottom line.

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 posed 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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Page 2

September 16, 1994

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 which have not been discussed on the record. If you do, syndicators will immediately change the way they market their shows in anticipation of a rule change, and my station will have a harder time getting the product it needs as a result. I've already seen them try this in our market with shows like "Golden Girls", "Seinfeld", etc.

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.

If you would like to discuss any of these issues further, please feel free to call me.

Sincerely,



**Peter Temple**  
**Vice President & General Manager**  
**WLVI-TV, Boston**

PT/mz



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

# KSMO TV 62

September 12, 1994

913.621.6262

facsimile  
913.621.4703

PH-103

## RECEIVED

SEP 19 1994

DOCKET FILE COPY ORIGINAL MAIL ROOM

Mr. Bob Ratcliffe  
Law Assistant Chief, Rm. 314  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

OFFICE OF CHIEF  
SEP 19 11 49 AM '94  
MASS MEDIA BUREAU

Dear Mr. Ratcliffe:

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



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JM/cn

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94-123

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SEP 19 3 10 PM '94

R. KENT REPLOGLE  
VICE PRESIDENT/GENERAL MANAGER

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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. - Room 814  
Washington, DC 20554

Dear Chairman:

The trade press indicates that at its October meeting the FCC may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of station WHNS-TV, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to my station. It has allowed us as a UHF station to grow to a viable competitor against the dominant VHF stations. I think the evidence is clear that the rule continues to be absolutely necessary to promote diversity and competition in local television markets. PTAR also supports the Commission's long held goal of creating new off-air television networks.

It is clear that without the off-network rule, our station and other FOX affiliates and 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 children's programs and public affairs programming.

Huge changes are taking place in television. Further consolidation between producers and the big three networks is very likely. As these mega mergers take place, stations like WHNS-TV will have a much more difficult time obtaining programming rights. Absent the off-network portion of PTAR, obtaining quality competitive programming for access may be impossible for us. Clearly the public interest is not served if one of the promoters of free over-the-air programming is forced into second class status.

We urge the FCC not to change the status of PTAR. However, should the Commission choose to examine this issue, it should do so under a Notice Of Inquiry rather than proceeding with a full rule making. Let the record become complete with a full discussion of issues that are very complex and still unresolved.

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By eliminating the off-network provision of PTAR, competition will be diminished. The Commission must continue a policy which promotes competition. Stations such as my own deserve a chance to compete. I urge you to retain the off-network rule.

Sincerely,

*R. Kent Replogle /vcm*

R. Kent Replogle

44-123

951 WHITEHAVEN ROAD  
GRAND ISLAND, NEW YORK  
14072-1998

716/773-7531 TEL  
716/773-5753 FAX



September 14, 1994

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SEP 19 1994

FCC MAIL ROOM

Office of Mass Media Roy Stewart  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Chief Stewart:

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 WUTV, I strongly urge you not to retain the "off-network" portion of the rule.

The relaxation of the off-network rule is very important to my station and is necessary to provide continued ability to program product already purchased. As a station that may be changing from a Fox Network station to that of another network, it is essential we be allowed to honor contracts, in their entirety, that were entered into months ago. WUTV holds contracts for "Home Improvement", "Seinfeld", "Prince of Bel Air", "The Simpsons", and "Blossom". This product represents an investment of many millions of dollars and restricting our use of them between 7:00-8:00pm would mean a considerable net loss to our station.

Additionally, because of the many changes taking place in our industry, vis-a-vis station affiliation changes, the repeal of the "off-network" portion of the Prime Time Access Rule would allow stations to make the investments necessary to keep their stations competitive without suffering undue financial loss if their stations become earmarked for affiliation change.

I strongly feel that if the FCC examines this issue, it should proceed directly to rule making.

PTAR was a ruling that was necessary at a different time in broadcast history. With the addition of the Fox Network, and the potential for at least one other network to take shape within the next year, it is a ruling that is no longer needed.

Sincerely,

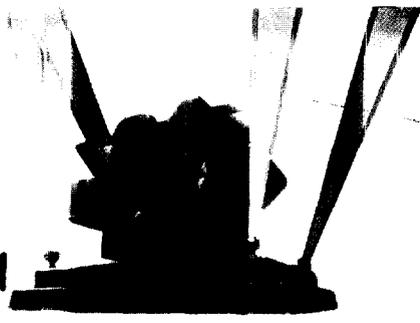
Willard J. Stone  
Vice President/General Manager

WJS/

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September 15, 1994

Federal Communications Commission  
Office of Chairman Reed Hundt  
1919 M Street, N.W. - Room 814  
Washington, DC 20554

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JACK L. PECK  
Vice President and  
General Manager

SEP 19 1994

Dear Commissioner Hundt,

FCC MAIL ROOM

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 WPTY in Memphis, TN, 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 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 my own deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

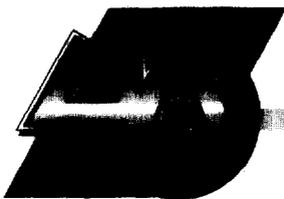
Sincerely,

*Jack*  
Jack L. Peck  
FOX 24 WPTY

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*8*

2225 Union Avenue  
P.O. Box 42424  
Memphis, TN 38174-2424  
(901) 278-2424  
FAX (901) 272-8759



WGNX ATLANTA  
A TRIBUNE BROADCASTING STATION

1810 Briarcliff Road N.E. Atlanta, GA 30329-4000 P.O. Box 78097 Atlanta, GA 30359-1797  
(404) 325-4646 (404) 633-8358 Fax

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September 15, 1994

Chairman Reed Hundt  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

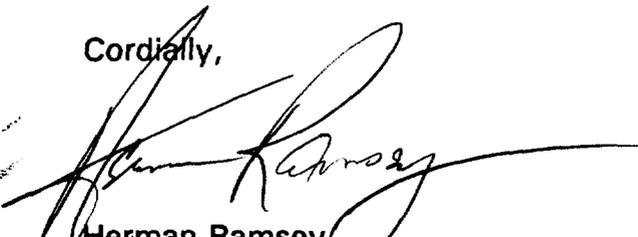
Dear Chairman Hundt:

When you saw this letter was from a major market independent station, I have no doubt you immediately knew the subject of concern. WGNX is an Atlanta station that under 10 years of ownership by Tribune Company has come from barely known in the market to a major player providing prime time news equal in quality to any in the market and about to launch (9/19) an early newscast. The Off-Network portion of the Prime Time Access Rule can be credited with providing the opportunity for our voice to be heard when otherwise it might not.

Don't eliminate this rule. Competition is good. Diversity is good. News choices are good and valued by the public. I think it is your responsibility to promote competition and diversity and a multiplicity of voices. I also think you know all the arguments, but retaining the Off-Network rule is the only way to achieve that competition and diversity.

Please proceed in your October meeting cautiously, and I believe you'll see the wisdom of retaining the rule.

Cordially,

  
Herman Ramsey  
Vice President and General Manager

HR/car

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Jerry Carr  
General Manager

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FCC MAIL ROOM

September 15, 1994

Office of Mass Media  
Federal Communications Commission  
1919 M. Street NW Room 314  
Washington, DC 20554

Dear Sir:

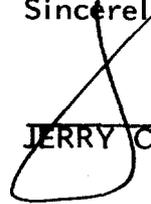
As an independent station operator in Miami, Florida, I am extremely concerned that the FCC plans to examine the Prime Time Access Rule in the near future. I am hopeful that the "official network" aspects of the rule will be left in place.

In Miami, the Prime Time Access Rule has allowed two (2) independent stations to flourish alongside a full complement of ABC, NBC, CBS and FOX affiliates. These two (2) stations now may each, in turn, become an affiliate of the proposed Warner Brother's and Paramount networks, respectively. In essence, the Commission's desire to see new television networks emerge has been fulfilled, in part, by the off-net provisions of PTAR.

Our station's viability depends on our ability to acquire top-notch off-network programming for the prime access time period. As our most profitable daypart, any decline in our competitiveness in this area will crimp our ability to finance public affairs and children's educational program efforts. Furthermore, as studio groups and networks collaborate to enter first run syndication, many alternative sources of programming will be squeezed out. We'll be left with a few, behemoth distributors providing all programming for the American public.

I strongly urge the FCC to examine this issue closely before considering any rule making. The complex competitive issues surrounding PTAR and the off-network rule deserve intense scrutiny before any changes are effected.

Sincerely,

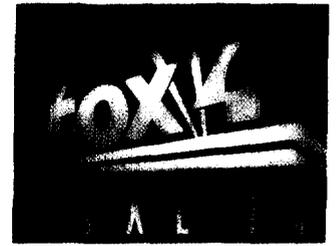
  
\_\_\_\_\_  
JERRY CARR

JC/ps  
b:work4/senate3

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94-183

DUPLICATE FILE OF ORIGINAL



September 13, 1994

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

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SEP 19 1994

FCC MAIL ROOM

Dear Mr. Stewart,

It is my understanding that the Federal Communications Commission will be looking to relax the Prime Time Access Rule. Speaking for my station, I urge you to keep the "off-network" part of the rule in tact. It is vitally important to KTXL and is really necessary to keep the current diversity and competition going in local television markets.

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

There are major changes taking place in the broadcast industry. Mergers between networks and program producers are not far off. If this happens and the big three networks enter the off-network and first run syndication market, my station will have a difficult time obtaining the rights to programs. Eliminating the off-network rule could make it impossible. Without PTAR and the off-network rule, TV viewers will get all of their programs from a few telecommunications giants. This is not in the public interest.

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

I urge you to proceed with extreme care and retain the off-network rule.

Sincerely,

*Michael A. Fisher*

Michael A. Fisher  
President/General Manager

OFFICE OF CHIEF

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MASS MEDIA BUREAU

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September 14, 1994

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Edward Aiken

MASS MEDIA BUREAU

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OFFICE OF CHIEF

Mr. Roy Stewart  
Chief, Mass Media  
Federal Communications Commission Office of Mass Media  
1919 M Street NW Room 314  
Washington, DC 20554

President/  
General Manager

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SEP 19 1994

Dear Mr. Stewart:

FCC MAIL ROOM

It is my understanding the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of WTOG-TV, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to WTOG-TV 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 such as WTOG-TV 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 WTOG-TV'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, WTOG-TV 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. This is not in the public interest.

365 105th Terrace N.E.

St. Petersburg, Fl. 33716

(813) 576-4444

Tampa (813) 223-7471



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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 WTOG-TV deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. 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.

Sincerely,



Edward G. Aiken

EGA:cja

94-123

mmk

951 WHITEHAVEN ROAD  
GRAND ISLAND, NEW YORK  
14072-1998

716/773-7531 TEL  
716/773-5753 FAX



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FCC MAIL ROOM

Office of Commissioner Reed Hundt  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Commissioner 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 WUTV, I strongly urge you not to retain the "off-network" portion of the rule.

The relaxation of the off-network rule is very important to my station and is necessary to provide continued ability to program product already purchased. As a station that may be changing from a Fox Network station to that of another network, it is essential we be allowed to honor contracts, in their entirety, that were entered into months ago. WUTV holds contracts for "Home Improvement", "Seinfeld", "Prince of Bel Air", "The Simpsons", and "Blossom". This product represents an investment of many millions of dollars and restricting our use of them between 7:00-8:00pm would mean a considerable net loss to our station.

Additionally, because of the many changes taking place in our industry, vis-a-vis station affiliation changes, the repeal of the "off-network" portion of the Prime Time Access Rule would allow stations to make the investments necessary to keep their stations competitive without suffering undue financial loss if their stations become earmarked for affiliation change.

I strongly feel that if the FCC examines this issue, it should proceed directly to rule making.

PTAR was a ruling that was necessary at a different time in broadcast history. With the addition of the Fox Network, and the potential for at least one other network to take shape within the next year, it is a ruling that is no longer needed.

Sincerely,

Willard J. Stone  
Vice President/General Manager

WJS/df

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September 14, 1994

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94-133  
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Edward G. Alken

President/  
General Manager

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

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SEP 19 1994

FCC MAIL ROOM

Dear Commissioner Hundt:

It is my understanding the Federal Communications Commission may initiate a proceeding looking to relax the Prime Time Access Rule. On behalf of WTOG-TV, I strongly urge you to retain the "off-network" portion of the rule.

The off-network rule is vitally important to WTOG-TV 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 such as WTOG-TV 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 WTOG-TV'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, WTOG-TV 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. This is not in the public interest.

365 105th Terrace N.E.

St. Petersburg, Fl. 33716

(813) 576-4444

Tampa (813) 223-7471



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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 WTOG-TV deserve a chance to compete. I urge you to proceed with extreme care and retain the off-network rule.

If the FCC intends to examine this issue, it should do so in the context of a neutral Notice of Inquiry. 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.

Sincerely,

A handwritten signature in cursive script that reads "Edward G. Aiken". The signature is written in black ink and is positioned above the printed name.

Edward G. Aiken

EGA:cja

cc: Merrill Spiegel



DOCKET FILE COPY ORIGINAL 94-123

September 15, 1994

KWGN-TV DENVER

SEP 19 3 10 PM '94

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

RECEIVED

John Suder  
Vice President  
and General Manager

6160 So. Wabash Way  
P.O. Box 5222  
Englewood  
Colorado 80155  
303.740.2850  
FAX 303.796.3740

SEP 19 1994

Dear Chairman Hundt:

FCC MAIL ROOM

I would like to bring to your attention an issue of utmost importance. This fall the Federal Communications Commission may initiate a proceeding to relax the *Prime Time Access Rule*. May I urge you to retain the "off-network" portion of this rule in the public interest.

Since this portion of PTAR has been instrumental in creating a strong independent television industry, the rule is vitally important to KWGN, and necessary to promote diversity and competition in our market. It is also an essential element in the Commission's goal of creating new off-air television networks.

Without the off-network rule, KWGN will have a difficult time securing the rights to quality off-network programming to air during the access period. More importantly, this will have a negative impact on our ability to finance programming for other dayparts, including news, public affairs and children's programming.

Major changes are taking place in the broadcast industry. With the big three networks poised to enter the off-network and first run syndication market, KWGN will have difficulty negotiating the rights to programming. Eliminating the off-network rule may make it impossible. As a result, the American public will then receive all information and entertainment programming from a few telecommunications sources.

May I recommend that if the Commission plans to examine this issue, to do so in the context of a neutral Notice of Inquiry. By so doing, the FCC would allow the many unresolved and complex issues to be discussed on the record.

Elimination of the off-network provision of PTAR would return us to a system where the three major networks can eliminate independent producers and stifle competition from non-network affiliated stations. The commission has the responsibility of promoting competition, which is what we seek. I urge you to retain the off-network rule.

Sincerely,

John Suder  
Vice President & General Manager

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September 15, 1994

SEP 19 1994

FCC MAIL ROOM

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

Dear Chairman Hundt,

It has come to my attention that the Federal Communications Commission may initiate discussions or proceedings to relax or eliminate the Prime Time Access Rule (PTAR). Why? It's working. The off-network portion has accomplished exactly what it intended to do when it was enacted.

If any revision of this rule is considered, expanding the off-network portion to the top 100 markets would better serve the public interest.

The original goal of the Prime Time Access Rule - to increase the amount of independent producers and not allow the three major networks to squeeze out this competition - has brought the American public a choice of original programming they would not have been able to enjoy. It has also given independent television stations the opportunity to compete and survive in their markets because they have been able to secure competitive programming and give the American public more choice.

I doubt sincerely if our station would have been able to survive its first three years of operation if the PTAR and the off-network portion had not been in effect.

I urge you to carefully weigh the effects that any relaxation of PTAR will have on Independent producers and stations.

Sincerely,

Tom Watson  
General Manager  
WTTA-TV

cc: Merrill Spiegel

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