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POLICY & RULES DIVISION

October 4, 1994

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

Dear Chairman Hundt:

I am writing to urge the Commission to proceed expeditiously with a Notice of Proposed Rulemaking directed at the elimination of the "off-network" restriction of the Prime Time Access Rule.

I have worked in the advertising and the broadcast industry for over 30 years. I have held various management positions at television stations in markets ranging from top 10 to 130+. When "PTAR" was first put into law I was working at a major advertising agency and part of my responsibility was obtaining clearances for first run programming produced and sponsored fully by a major automotive manufacturer. I do not believe that the Prime Time Access Rule has ever achieved its intent. I believe it impedes rather than fosters competition. I also believe that the prohibition artificially inflates the prices affiliated stations are forced to pay for programming and creates an economic windfall for a few producers and distributors.

The Commission has received numerous pleadings which fully address this issue. A Notice of Inquiry is not necessary and will only delay the implementation of this needed reform. As we all know, the television marketplace is changing rapidly. I would hope that you will proceed with a Notice of Proposed Rulemaking and that the Commission will act to eliminate this outdated restriction.

Thank you for considering my views.

Sincerely,

John M. Llewellyn  
President and General Manager

JML:dm

Via facsimile and U.S. Mail

- cc: Commissioner James H. Quello
- Commissioner Andrew C. Barrett
- Commissioner Susan Ness
- Commissioner Rachelle B. Chong
- Office of the Secretary

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