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Chairman Reed Hundt
Federal Communications Commission
1919 M St., NW
Washington, D.C. 20554

August 28, 1995

DOCKET FILE COPY ORIGINAL

Re: MM Docket No. 93-48

Dear Chairman Hundt:

The Cedar Rapids Television Company, licensee of KCRG-TV and KCRG-AM, Cedar Rapids, Iowa, offers the following comments regarding MM Docket No. 93-48.

The Commission is now considering new, stricter rules implementing the Children's Television Act, including the possibility of numerical "quotas" requiring broadcasters to devote minimum amounts of time to educational and informational children's programming.

We are opposed to more and stricter regulations for the following reasons:

1. **The amount of children's educational programming has increased.**

As a local broadcaster we have significantly increased the amount of children's educational and informational programming in response to the Children's Television Act. Furthermore, we devote prime time in addition to other time periods to this type of programming, to assure that the largest possible audience can see it. Yet we get no more credit for prime time programming than programming broadcast to much smaller audiences in other time periods.

We continue to produce significant amounts of local and national children's programming. As a licensee for the Cedar Rapids-Waterloo-Dubuque market, we've determined what's best for our community's children in consultation with local community leaders. Establishing national quotas and definitions administered by Washington imposes a national censor's ideas about what's educational upon the people of our community.

2. **Establishment of government-mandated quotas may force our station to curtail local news programming.**

We produce six (6) major newscasts every day, Monday through Friday.

Monday-Friday Local News Programming

Program	Time Period	Length
TV 9 Early Morning News	5:30 to 6:00 a.m.	30 minutes
TV 9 Morning News	6:00 to 7:00 a.m.	60 minutes
TV 9 11:30 News	11:30 to 12:00 p.m.	30 minutes
Live at Five	5:00 to 5:30 p.m.	30 minutes
TV 9 News at Six	6:00 to 6:30 p.m.	30 minutes
TV 9 Nightcast	10:00 to 10:35 p.m.	35 minutes

On Saturday we produce three major newscasts including three hours of morning news:

Saturday Local News Programming

Program	Time Period	Length
TV 9 Sat. A.M. News	6:00 to 9:00 a.m.	3 hours
TV 9 Sat. 5:30 News	5:30 to 6:00 p.m.	30 minutes
TV 9 Sat. Nightcast	10:00 to 10:35 p.m.	35 minutes

On Sunday we produce three major newscasts including two hours of morning news.

Sunday Local News Programming

Program	Time Period	Length
TV 9 Sun. A.M. News	6:00 to 8:00 a.m.	2 hours
TV 9 Sun. 5:30 News	5:30 to 6:00 p.m.	30 minutes
TV 9 Sun Nightcast	10:00 to 10:35 p.m.	35 minutes

Significantly, a great deal of our local news is broadcast on weekend mornings, which are time periods usually scheduled with programs for children. If the Commission impose numerical quotas upon us, we may be forced by government edict to replace our local news with children's programming to comply with those quotas. Thus, the Commission will have substituted its judgment for ours.

3. Quotas are unnecessary.

Broadcasters are responding to the Act and the unquantified obligation the Act imposes for more and better educational programming for children. Quotas set the maximum...as well as the minimum.

The National Association of Broadcasters recently filed a study with the Commission which shows that the amount of time broadcasters devote to informational and educational children's programming has increased more than 100% since passage of the Children's Programming Act.

4. Quotas and government definitions of what is "educational" or "informational" children's programming may be Unconstitutional.

The establishment of programming type-specific quotas and imposition of the Commission's definition of what is and is not educational programming may violate the Free Speech provisions of the U.S. Constitution.

Broadcasters understand the current definition of "educational and informational children's programming. No changes are needed.

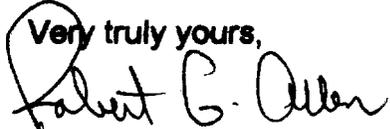
5. Broadcasters should get credit for short-segment programming.

Presently our station gets no credit for educational and informational segments which are less than five minutes in length. Yet, given the attention span of children and the hundreds of viewing choices available to children in today's electronic universe, short segments may be one of the most successful ways to deliver educational or informational material to children.

Licensees are discouraged from using these short segments because the Commission gives them no credit for broadcasting them.

In short, we feel that national programming quotas and national definitions of what constitutes "informational and educational children's programming" are unnecessary, burdensome, and Unconstitutional. We urge the Commission not to expand the rules, despite pressure from pressure groups who would like to substitute their judgment for the judgment of the broadcast licensees of this nation.

Very truly yours,

A handwritten signature in cursive script that reads "Robert G. Allen". The signature is written in black ink and is positioned above the typed name.

Robert G. Allen
Vice President and General Manager



September 1, 1995

Chairman Reed Hundt
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

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93-48

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Dear Chairman Hundt,

I am writing on behalf of **WGME-TV** in reference to **MM Docket No. 93-48**, the Commission's proposed rule making to tighten the regulations contained in the Children's Television Act.

Ever since this Act was instituted in 1990, local, syndicated and network broadcasters have substantially increased the amount and the quality of children's educational and informational programming.

At **WGME** we strive to acquire and to produce programming that will be beneficial to young viewers. But we also have an obligation to serve *all* viewers with news, information, public affairs and entertainment programming.

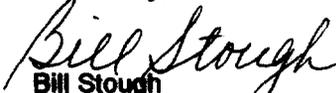
If the Commission decides that a quota system for quantifying the number of hours that a local station must devote to children's educational and informational programming is proper, **WGME** and stations like it will be forced into serving the public interest, convenience and necessity *only as specifically defined by the Commission!*

Your recent comment that "It's time to abandon the fiction that asking broadcasters to do better on a volunteer basis has any chance of producing the desired results" is an unfortunate reading of how seriously local television stations view the Children's Television Act. We at **WGME** feel that the Act is working, that the majority of stations are striving to increase such programming and that quotas are not only unnecessary, but come perilously close to violating broadcasters' First Amendment rights.

WGME opposes new rules that would amend the Children's Television Act. We feel that the Commission should allow local stations to serve their local communities. Local viewers will let us and the Commission know if we are not fulfilling our obligations.

Thank you.

Yours truly,


Bill Stough
President/General Manager

WGME-TV  A CBS Affiliate