

Resident
233 Mountain Ave. 10795
New Providence NJ 07974-2636



RECEIVED
SEP 15 1995

Federal Communications Commission
Office of the Secretary
1419 M Street, N.W.
Washington, D.C.
20554

MM Docket 93-48

Sept 10, 1995

Dear Sir

DOCKET FILE COPY ORIGINAL

No. of Copies rec'd
List ABCDE

Surely, you must have
 noticed that the major TV
 networks have gone out of
 control with the exploitation
 of sex and violence on TV
 reaching the privacy of our
 homes. The networks have
 failed to serve the public
 interest and they do not
 deserve to have their licenses
 renewed. The V-chip concept
 is a joke. The responsibility
 has always been on the shoulders
 of the Broadcasters. Their
 programs unquestionably have
 had an effect, deleterious
 effect, on the public.

Sincerely
 Joseph Jackson



Mr Joseph Jackson
 233 Mountain Avenue
 Murray Hill NJ 07974

DOCKET FILE COPY ORIGINAL

Federal Communications Commission,

9-11-95

We do not have ~~any~~ educational programs being ~~received~~ **RECEIVED** The television programs are designed **SEP 15 1995** for pure commercial reasons **NO MAIL ROOM** to sell toys to children. There is not any social or educational redeeming factors. Our children are more important than to be used for propaganda to sell toys to. We need to require ~~more~~ educational shows for every 2 hrs. shown of cartoons ~~with~~ ^{that have} no redeeming values of education. Also, these educational shows need to be shown prime time when children are home from school to watch them. Such as before school, ~~and~~ after school and early evening.

(next page)

No. of Copies rec'd
List ABCDE

0

As a family we watch Oregon
Public Broadcasting because
they show educational shows
such as Magic School Bus,
Reading Rainbow and Storytime.
We do give credit to television
for such shows as Bill Nye
science program.

Thank you.

Denise Ostermann

MILES & DENISE OSTERMANN
11300 N.E. 64th AVE.
VANCOUVER, WA 98686

THE VBCDF
NO. of Copies Recd

93-48



**Starting
a New
Tradition**

K S N T

September 12, 1995

RECEIVED

SEP 15 1995

FCC MAIL ROOM

Secretary
Federal Communications Commission
1919 "M" Street, NW
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Dear Secretary:

My letter is to voice opposition to the "Notice of Proposed Rule Making" which would considerably tighten rules implementing the Children's Television Act, possibly setting numerical "quotas" for educational and informational children's programming. [Docket Number - MM Docket No. 93-48.] Following are the basic reasons for my opposition.

- 1) The current FCC Rules and The Children's Television Act are working now. New rules are unnecessary.
- 2) Broadcasters have, themselves, added significant "educational and informational children's programming" showing a clear understanding of the current definition.
- 3) Making rules which quantify the amount of required programming are unnecessary because broadcasters are already responding to the Children's Television Act without the quantified obligation.
- 4) Quantification can set maximum as well as minimum obligations.

Thank you for giving this matter consideration. We are working to make it better.

Sincerely,

Gary Sotir
Vice President
General Manager

cc: Chairman Reed Hundt
Commissioner James Quello
Commissioner Andrew Barrett
Commissioner Susan Ness
Commissioner Rachelle Chong
NAB Legal Department
Gary Schmedding, Lee Enterprises

No. of Copies rec'd _____
List ABCDE

0

6835 North West Highway 24
P.O. Box 2700 Topeka, Kansas 66601-2700

913/582-4000 Tel 913/582-5283 Fax

SEP 15 1995

FCC MAIL ROOM

Wabash Valley Broadcasting Corporation
401 Pennsylvania Parkway, Suite 300
Indianapolis, Indiana 46280
(317) 844-7484
FAX: 317-844-1243
TWX: 910-240-9342

September 12, 1995

Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: MM Docket No. 93-48

DOCKET FILE COPY ORIGINAL

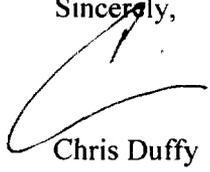
Dear Mr. Caton:

Quotas are unequivocally unnecessary. Quantification, as has already been said, sets maximums as well as minimums, a scenario with far-reaching implications endangering more than the television industry alone; and at a time when, we understand, the NAB is filing a new study showing more than a 100% increase in the amount of educational and informational programming broadcast since the passage of the Act.

Quantification? Who is to say, for example, that the 5-minute program aired weekly for the past decade on our Terre Haute, Indiana station which teaches "learning through reading" on Saturday mornings in cooperation with the Vigo County school system (for which an equivalent five minutes of local commercial inventory is pre-empted) has not served equally as well in that community as the increase of some two and a half hours of "core" children's programming from first quarter 1994 to 1995 by our Ft. Myers, Florida station (whose many non-program activities may go un-measured and without credit under proposed Commission guidelines)?

We do understand the current definition of "educational and informational" children's programming. Current rules are working. New rules are not needed. Above all, rules which attempt to quantify the kaleidoscope of quality service rendered our children by broadcasters foretells of a growing mass of regulation and intervention which is frightening to contemplate and greeted with dismay.

Sincerely,



Chris Duffy

- cc: Chairman Reed Hundt
- Commissioner James Quello
- Commissioner Andrew Barrett
- Commissioner Susan Ness
- Commissioner Rachelle Chong

No. of Copies rec'd 0
List ABCDE



KOPLAR COMMUNICATIONS INC.

4935 LINDELL BLVD. ■ ST. LOUIS, MISSOURI 63108 ■ 314-367-7211

EDWARD J. (TED) KOPLAR
PRESIDENT

(314) 454-6422

FAX: (314) 454-6445

September 11, 1995

DOCKET FILE COPY ORIGINAL

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

SEP 15 1995

RE: FCC DOCKET NO. MM Docket, No. 93-48

Dear Sir or Madam:

I am writing to comment upon the FCC's Notice of Proposed Rulemaking which contemplates tightening the rules for implementation of The Children's Television Act, including further restricting the definition of educational and informational children's programming and the possibility of imposing on over-the-air broadcasters numerical "quotas" for such programming.

I am writing to you as a broadcaster who has been involved in children's programming since our station "signed on" in 1959. I am also writing as a concerned father of five children ranging in age from six to seventeen.

It seems ironic that the Commission should be considering such actions in this era of de-regulation and at a time when the very concept of "quotas" is being questioned and the notion of government-imposed numerical quotas on private businesses has fallen into disfavor.

It is my view that focusing upon numerical quotas of any kind, whether that be hours of programming per week or number of commercial minutes, undermines the goals of the Commission and the original intent of The Children's Television Act because it places the emphasis on the quantity of programming rather than on the quality of the content of that programming.

Thus, while a decision by the Commission to impose numerical quotas would unquestionably succeed in placing undue regulatory burden on broadcasters, such quotas provide no assurance that more quality programming will be available to children. Indeed, in some instances, such quotas may have the opposite effect. Commercial broadcasters are in a unique position: as licensees of the FCC, they are sworn to operate in the public interest and to adhere to the regulations and guidelines established by the FCC; they are also private businesses whose very survival depends upon their ability to make a profit.



CORPORATE HEADQUARTERS/KPLR-TV ■ ST. LOUIS, MISSOURI
KRBB-TV ■ SACRAMENTO, CALIFORNIA
WORLD EVENTS PRODUCTIONS, LTD. ■ NEW YORK, ST. LOUIS AND LOS ANGELES
KOPLAR COMMUNICATIONS CENTER ■ ST. LOUIS, MISSOURI

No. of Copies rec'd 1
List ABCDE

Secretary of The Federal Communications Commission
September 11, 1995
Page 2

I would respectfully ask the FCC to be mindful of the delicate balance which commercial broadcasters must maintain between regulatory compliance and profitability.

To put broadcasters in a position where they may be forced to air inappropriate or poor quality children's programming simply to comply with a numerical quota is counter-productive. We are already losing young viewers to Cable and, since it is difficult for a locally-owned Independent station such as ours to produce children's programming "slick" enough to compete with the likes of such morally-uplifting Cable icons as "Beavis and Butthead" and "Ren and Stimpy," the ultimate consequence of numerical quotas or of additional restrictions on program content may be to make Cable a more attractive choice for our young viewers.

Historically, advocates of government-imposed numerical quotas argued that such quotas are necessary because businesses will not self-regulate. However, since it is my understanding that there has been more than a 100% increase in the amount of educational and informational children's programming broadcast since passage of The Children's Television Act, it is clear that in this case, the traditional argument in favor of numerical quotas has absolutely no validity.

I'd like to describe some of the things we are doing in the areas of children's programming and community outreach at KPLR-TV in St. Louis.

Throughout its 36-year history, KPLR-TV has been recognized as THE family station in St. Louis, and we take great pride in that fact. Beginning in the 1960's with our production of the popular and successful "Captain 11's Showboat," KPLR-TV has maintained an on-going commitment to the production of original programming geared toward educating, informing, and entertaining young viewers in a positive manner. We believe that KPLR-TV has always performed credibly, responsibly, and "in the public interest" with respect to the children's programming we produce and broadcast and we will continue to do so as long as we are on the air, with or without additional FCC regulations.

Membership in our Kids' Club, ST. LOUIS 11 KIDS, is free to all children through 12 years of age and total membership currently stands at 145,000. Members receive a Card which entitles them to free or discounted admissions to various attractions such as The Magic House and The St. Louis Science Center. Four times a year, all members receive in the mail our award-winning Kids Club Newsletter which contains informative articles, creative and thought-provoking activities, and a variety of contests, games, and puzzles which are both educational and fun. Also included is an

article written especially for parents titled, "A Pause for Parents."

The KIDS' CLUB CREW consists of three young adults who serve as "on air" talent in our children's programming blocks and who present a school and camp program to area kids from kindergarten through sixth grade. This program, which focuses on development of a positive attitude and positive self-esteem, is presented a minimum of once a week to an average audience of 400 children. Among the KIDS' CLUB CREW'S many community outreach activities, they also work with the St. Louis Public Library in encouraging kids to read and are involved in various activities with the children in the two large Children's Hospitals in our community.

The CREW'S "on-air" appearances consist of eleven interstitial segments per day. These include "Tip Time" which is a special tip on safety, health, or nutrition; "Role Call," in which each audience member tells a little about himself; and "Mary, Mary" which features a senior citizen who tells kids about "the good old days" and ends each segment with a positive message.

In addition, KPLR-TV created and supports TEAM 11, a group of talented singers and dancers from local high schools and colleges who are also outstanding students, athletes, and school leaders. TEAM 11 participates in programs, spots, and PSA's broadcast on KPLR-TV and performs at various schools, community fairs, charitable benefits, and professional sporting events throughout the year. The members of TEAM 11, with their fresh good looks, talent, enthusiasm, and upbeat message have won the hearts of kids and adults alike and are positive role models for young people throughout this area.

I trust that the foregoing demonstrates that KPLR-TV takes seriously its responsibilities to the young people in the St. Louis market. We believe that we are fulfilling our responsibilities to our young viewers now, and we will continue to develop creative and relevant ways to engage, educate, inform, and entertain them in positive ways in the future, without the imposition of additional government regulations.

Speaking as a father, I resent and deplore the content of shows such as "Beavis and Butthead," "Ren and Stimpy," and "The Simpsons." These shows exploit kids by appealing to their fascination with "dirty" words, by promoting the idea that it is "cool" to make jokes about penises and vaginas, and by making it seem somehow acceptable to cultivate disrespectful and demeaning attitudes toward the family unit and toward family relationships.

Secretary of The Federal Communications Commission
September 11, 1995
Page 4

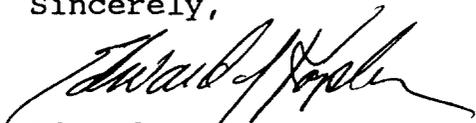
Although I oppose censorship and acknowledge the argument of defenders of the "Beavis and Butthead" genre who contend that the fault lies not in the programming, but in the lack of parental supervision, their argument fails to take into account the millions of latchkey kids who are a fact of our current lifestyle.

As long as the FCC and the Children's advocacy groups who are seeking additional restrictions on commercial broadcasters choose to look the other way while the reprehensible moral bankruptcy epitomized by the "Beavis and Buttheads" and the "Ren and Stimpy's" of the Cable world continue unchallenged and unabated, I consider any effort by the FCC to impose additional children's programming regulations unilaterally on over-the-air broadcasters unwarranted, excessive, and unfair. If the FCC Commissioners vote to proceed with this Rulemaking, I envision a frightening scenario in which the imposition of additional regulations on the amount and content of children's programming restricts broadcasters' creative options to the extent that young people are eventually "turned off" by programming on broadcast television and seek refuge in the vacuous world where Beavis and Butthead are the role models.

Over-the-air broadcasters have already overwhelmingly demonstrated that they are living up to the goals and the spirit of The Children's Television Act, as originally enacted. Any efforts at further reform or regulation undertaken by the FCC should be directed at new and different targets -- targets in that segment of our industry where sub-standard, morally-deficient children's programming is routinely produced and broadcast and where insulting and offensive programming aimed at young people is standard fare.

Thank you for the opportunity to comment on the Proposed Rulemaking to be considered under FCC Docket Number: MM Docket, NO. 93-48.

Sincerely,



Edward J. Koplar
President and Chief Executive Officer
KOPLAR COMMUNICATIONS, INC.

EJK/bwh

DOCKET FILE COPY / ORIGINAL

September 11, 1995

Tom Allen
Station Manager
(919) 821-8510
Fax (919) 821-8566

Secretary
Federal Communications Commission
1919 M St. NW
Washington, DC 20554

RECEIVED

SEP 15 1995

DOCKET FILE COPY

Re: MM Docket No. 93-48.

Ladies and Gentlemen:

As a local television station operating in the Raleigh-Durham market, we wanted to take a moment to respond to your notice of Proposed Rule Making regarding the Children's Television Act.

We oppose the concept of a quantitative standard which would set numerical goals for educational and informational children's programming. We feel that this action is unnecessary. According to the results of a recent NAB survey, broadcasters have "significantly increased children's educational and informational programming in response to the Children's Television Act."

In addition, our station spends time and money investing in locally produced children's programs. We currently produce and air a weekly half hour entitled "Sparks", we produce and air a monthly program entitled "Androgena", and we produce weekly "Kid's News" segments. Both "Sparks" and "Androgena" have been nominated for and/or won the national Iris award and numerous Emmy awards.

We totally agree that the Commission should encourage stations to meet a reasonable and necessary obligation to children's programming. Each station should be judged by its response to the Act, and special consideration should be given to local program development. However, we feel that reducing the obligation to some numerical goal or quota will simply frustrate the intent of the act. Instead of worrying about numerical goals, we feel our concern should be to provide quality programming that effectively contributes to the cognitive, intellectual and emotional development of the child audience.

Sincerely,



Tom Allen
Station Manager

cc: Chairman Reed Hundt
Commissioner James Quello
Commissioner Andrew Barrett
Commissioner Susan Ness
Commissioner Rachelle Chong

No. of Copies rec'd 0
List ABCDE

NEWS 15 CHANNEL

September 1, 1995

Secretary
Federal Communications Commission
1919 M. St., NW
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

SEP 5 1995

RE: MM Docket No. 93-48

WICD-TV opposes the FCC's Notice of Proposed Rule Making to the Children's Television Act. Broadcasters have significantly increased children's educational and informational programming in response to the Children's Television Act.

I believe that broadcasters understand the current definition of educational and informational children's programming. The Act and the current rules are working to increase this programming, and new rules are not needed. Rules quantifying the amount of children's programming are unnecessary.

Broadcasters are responding to the ACT and the unquantified obligation in the current rules with more and better educational and informational programming. WICD-TV schedules the following weekly thirty-minute programs that are specifically designed to serve the educational and informational needs of children 16 and under: Nick News, NBC's Name Your Adventure, NBC's Saved By The Bell - Part 1, NBC's Saved By The Bell -Part 2, and NBC's California Dreams. In addition to thirty-minute programming, short segment programming is important for kids and should get credit.

Sincerely,
Jack Connors



President & General Manager
WICD-TV

Copies to: Chairman Reed Hunt
Commissioner James Quello
Commissioner Andrew Barrett
Commissioner Susan Ness
Commissioner Rachelle Chong

No. of Copies rec'd 1
List ABCDE

WICD-TV
250 South Country Fair Drive • Champaign, Illinois 61821
PHONE (217) 351-8500  FAX (217) 351-6056

A Division of  Guy Gannett Communications



September 6, 1995

DOCKET FILE COPY ORIGINAL

Federal Communications Commission
1919 M St., NW
Washington, DC 20554

SEP 10 1995

RE: MM Docket No 93-48

Dear Chairman Reed Hundt:

I firmly believe that good children's programming will continue to be a priority and continue to increase without the necessity for additional rules, regulations, or quotas.

We, as broadcasters, understand the importance and the definition of quality programming specifically designed for our young people, and are acting responsibly to see that it is there for them. There has, in fact, been more than a 100% increase in the amount of educational and informational children's programming broadcast since the passage of the Children's Television Act.

I respectfully request that the FCC not establish any new rules or quotas in regard to this matter, but let the television industry continue to implement the current regulations which are clearly achieving what they were enacted to do

Best Regards,

Hugh V. Roche
General Manager

HVR/lh

cc: Chairman Reed Hundt
Commissioner James Quello
Commissioner Andrew Barrett
Commissioner Susan Ness
Commissioner Rachelle Chong
National Association of Broadcasters

No. of Copies rec'd 1
List ABCDE



MMR

DOCKET FILE COPY ORIGINAL

September 1, 1995

Secretary
Federal Communications Commission
1919 M. St., NW
Washington, D.C. 20554

SEP 12 1995

RE: MM Docket No. 93-48

WICS-TV opposes the FCC's Notice of Proposed Rule Making to the Children's Television Act. Broadcasters have significantly increased children's educational and informational programming in response to the Children's Television Act.

I believe that broadcasters understand the current definition of educational and informational children's programming. The Act and the current rules are working to increase this programming, and new rules are not needed. Rules quantifying the amount of children's programming are unnecessary.

Broadcasters are responding to the ACT and the unquantified obligation in the current rules with more and better educational and informational programming. WICS-TV schedules the following weekly thirty-minute programs that are specifically designed to serve the educational and informational needs of children 16 and under: Nick News, What's Up Network, NBC's Name Your Adventure, NBC's Saved By The Bell - Part 1, NBC's Saved By The Bell -Part 2, and NBC's California Dreams. In addition to thirty-minute programming, short segment programming is important for kids and should get credit.

Sincerely,
Jack Connors

President & General Manager
WICS-TV

- Copies to: Chairman Reed Hunt
- Commissioner James Quello
- Commissioner Andrew Barrett
- Commissioner Susan Ness
- Commissioner Rachelle Chong

No. of Copies rec'd 1
List ABCDE



RECEIVED
SEP 15 1995

September 14, 1995

FCC MAIL ROOM

Secretary
Federal Communications Commission
1919 M St. NW
Washington, DC 20554

DOCKET COPY ORIGINAL

RE: MM Docket No. 93-48

As a local broadcaster I feel it important that you are made aware of how much positive programming is being produced for children on the local level. For 32 continuous years, WIS Television has produced and broadcast a local children's program titled Mr. Knozit. Generations have grown up with him, learning valuable pro-social lessons from this lovable role model. The program has been embraced by South Carolinians for over three decades and was recognized for its excellence on a national level by winning the coveted Peabody Award. Mr. Knozit is broadcast in a "prime" time period for young people...Saturday morning at 10:30 AM; it is 100% educational and informational; and it receives the same high production and promotion treatment as every other program on our air.

WIS feels so strongly about children's programming that when we secured a second cable channel to program on a part-time basis, we decided to run The Disney Afternoon from 4-6 PM Monday through Friday. It is localized with Mr. Knozit cut-ins that are educational and entertaining.

In addition to full length programs, broadcasters dedicate a tremendous amount of their on-air inventory for public service announcements targeted to children. These spots are effective ways to encourage positive habits, learn about new things, and get involved in community activities. Plus, special segments in local newscasts that are targeted to children such as "Kids News"; "WeatherSchool"; or "Our Generation" go a long way to focus positive programming time on children's activities.

Rules quantifying quotas are unnecessary because broadcasters have responded to the Children's Television Act with more and better educational and informational programming for children.

Sincerely,

Diane Bagwell
Dir. Market Development

cc: Chairman Reed Hundt
Commissioner James Quello
Commissioner Andrew Barratt
Commissioner Susan Ness
Commissioner Rachelle Chong

No. of Copies rec'd 0
List ABCDE

RECEIVED

SEP 15 1995

From: <ASKIS@aol.com>
To: A16.A16(kidstv)
Date: 9/14/95 6:26pm
Subject: MM Docket 93-48 Children's Television Act

7372 Ohio St.
Mentor, OH 44060
9/14/95

Federal Communications Commission
Office of the Secretary
1919 M Street
N.W. Washington DC 20554

DOCKET FILE COPY ORIGINAL

RE: MM Docket 93-48

Dear Sir or Madam:

Many people complain about the lack of educational programming for children. I would have to say that these people have a valid point. However, I don't see why the federal government needs to step in and mandate increases in the amount of educational children's programming.

Sadly, most children's programming today is geared toward more than just entertaining children. Far too often, a line of products based on a show gets pushed in front of youngsters, who in turn beg and plead their parents to buy the products. I think way too many toy manufacturers are using children's television to market and to sell their products. For example, shows such as GI Joe and Teenage Mutant Ninja Turtles help children learn very little, if anything, and promote a multi-billion dollar industry for toy manufacturers and retailers.

The craze doesn't stop with just shows. Cable stations like the Disney Channel and Nickelodeon publicize their products and events too. The kids want not only the toys but also the videos and vacations to places like Walt Disney World and Disneyland, making large corporations such as Disney and six digit CEO's like Michael D. Eisner ever richer.

The federal government is not at fault for this happening. Part of the problem is that the television has become a "national babysitter." The television is mainly used to entertain. That's not to say that the television can not be used to aid the learning process. However, the television was never meant to replace a teacher.

Parents today need to take more time to sit down with their children and monitor the content and amount of television their children watch. Parents also need to be interested in their children's schoolwork and activities. It is not job of the Federal Communications Commission to play the role of a "national nanny."

Until society as a whole becomes more interested in its children, few constructive measures will be taken to improve children's programming. When society becomes completely sick and tired of children's programming that has little educational value and promotes nothing more than toys, videos, movies, and theme parks, the free market will respond. If society truly wants to see more educational children's programming, like Beakman's World, the free enterprise system will adapt to serve the public.

Until that time occurs, the federal government needs to refrain from placing strict regulations on required amounts of educational children's programming; bureaucratic regulations such as this begin to erode one basic principle of the First Amendment, freedom of speech

Sincerely,
Adam Stobinski

ASKIS@aol.com