

A. Mid-term Review of Programming Performance is Unnecessary.

Some commenters have asked the Commission to take on a mid-term review of station performance under the Act.⁴³ In response, INTV submits that the current system of enforcement is more than adequate. As noted above, the ultimate sanction awaits stations which disregard their obligations under the Act, and public monitoring is constant. Stations now are well aware of their obligations and monitor their own performance as well. No basis exists to add another layer of enforcement.

Furthermore, no lack of industry-wide compliance with the Act exists upon which general mid-term reviews might be predicated. The first round of renewals under the Act resulted in no finding of widespread disregard for the Act. No such showing exists in the record of this proceeding. Therefore, no mid-term review is justified.

B. Station Announcements Have Proven More Costly Than Beneficial.

Several commenters have urged that the Commission require announcements of one type or another with respect to stations' obligations and performance and/or the Commission's enforcement mechanisms.⁴⁴ Such announcements have been found worthless.⁴⁵ Moreover, they serve little purpose. Stations are far from invisible in their communities. Indeed, FCC rules assure

⁴³CME at 46.

⁴⁴CME at 44; CTW at 13.

⁴⁵*Renewal of License*, 49 RR 2d 740, 756, 757 (1981).

that they remain accessible to the public.⁴⁶ In short, members of the public know how and where to complain about station programming. No special announcements are required to remind them.



INTV concludes by reiterating its admonition that strict definitions and requirements will produce sameness and mediocrity. Children deserve better.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Popham', written over a horizontal line.

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November 15, 1995

⁴⁶See, e.g., 47 CFR §73.1125 (main studio location) and 47 CFR §73.3526 (public file rule).

