

EX-101 OR LATE FILED

EX-101 OR LATE FILED



CBS AFFILIATE

Fairfield Drive P.O. Box 24612 West Palm Beach, FL 33416-4612 407/844-1212 Fax 407/881-0741

e-mail: WPEC99A@prodigy.com  
WPECTV12@aol.com  
wpectv12@gate

RECEIVED

MAY 21 1996

August 23, 1995

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

Ref: MM Docket No. 93-48

Dear Secretary:

We do not believe that the quality of children's programming will be improved by increased regulation or by setting quotas. Increased regulation discourages innovation and creativity; and quotas set upper as well as lower limits.

Responsible broadcasters, such as WPEC, have already significantly increased programming to serve the informational and educational needs of children; and the syndication community is responding to new opportunities with innovative programs such as "Bill Nye The Science Guy," "Not Just News," "Belle's Sing Me A Story" and others.

Increased regulation and quotas only serve to homogenize programming to an arbitrary minimum standard. The broad language in the Children's Television Act and current FCC rules encourage stations to respond in creative ways appropriate for their own unique circumstances.

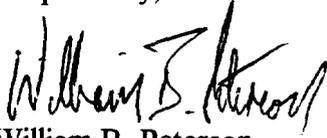
We do believe that the Commission should give more credit to short segment programming, rather than just long form programming. One only has to look to the success of thirty second commercials selling toys and breakfast foods to know that children can learn from short messages.

We also believe that credit should be given to the often significant off-air activities of broadcasters which serve the educational needs of children. For example, in the past three years WPEC has raised one million dollars to support local schools, helped recruit classroom volunteers and encouraged other businesses to donate computers, software, books and other supplies to school systems. Arbitrary programming rules might discourage stations from creating these kind of programs.



In summary, we believe the Children's Television Act and current FCC rules are working and that new rules and quotas are not necessary.

Respectfully,

A handwritten signature in black ink, appearing to read "William B. Peterson". The signature is written in a cursive, slightly slanted style.

William B. Peterson  
President and General Manager

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



208 DE BUYS ROAD ■ P.O. BOX 4596 ■ BILOXI, MS 39535-4596 ■ 601-345-1313

COPIES OR LATE FILED

MM93-48

August 23, 1995

POCKET FILE COPY ORIGINAL

MAY 21 1995

Mr. William F. Caton, Secretary  
Federal Communications Commission  
1919 M Street, NW - Room 222  
Washington, DC 20554

Dear Mr. Caton,

I am distressed to learn that the FCC is considering a change in the Children's Television Act that would add some quantity or quota factor to the act. Broadcasters throughout the country are making significant progress at providing programs for our children that serve their education and information needs.

Consider the following examples of both broadcast and non-broadcast efforts we have undertaken in a small market like Biloxi, Mississippi since the Children's Television Act was enacted:

**VIEWPOINT YOUTH** - A show dealing with teen issues like racism, drug abuse and violence. The show is researched, planned and produced with the aid of our station sponsored Boy Scouts of American Explorer Post. The WLOX-TV Explorer Post meets throughout the school year with WLOX advisors to plan and produce "Viewpoint Youth." Not only is this program geared toward teens, but it allows our Explorer teens hands-on educational experience in the field of broadcasting.

**KALEIDOSCOPE KIDS** - On the show we take local school kids on educational adventures and explore places like wilderness islands, our local space center and oceanariums...just to list a few. Among other things, we have learned about marine debris, nature and space exploration. Under the "Kaleidoscope Kids" umbrella we also broadcast puppet shows which educate kids about cultural differences, drug and alcohol abuse and divorce. Along with each of these programs, we also provide worksheets for local educators to use in their classrooms

**GET A CLUE** - In addition to these locally produced programs, we are working with our seven "sister" stations in our Cosmos Broadcasting family to produce an educational children's show called "Get A Clue." In just a few short weeks we will broadcast our first show which teaches children about ship navigation by taking them on a scavenger hunt that is all linked to their local library, computers and a mythical pirate. Here, too, a worksheet will be provided to our local educators to enhance the learning experience for our community's children.

**WLOX-TV NEWS GAME** - Locally we provide incentives to educate school children about current events. We publish and distribute a news game to all schools in our viewing area on a weekly basis during the school year. Teachers use our news game to educate their students about the community and the world.

**CHILDREN FIRST** - We also participate and provide local segments for an ABC program called "Children First." The latest program is a summer science show which teaches kids about weather and earthquakes. Our local segment deals with one of our most serious weather concerns in South Mississippi...hurricanes.

**KIDS VOTING USA** - WLOX-TV is also part of a non-profit organization called "Kids Voting USA." It is a program that educates the children in our community about the importance of voting by actually letting them vote at the polls with their parents on election day. In preparation for that mock vote, teachers are provided a lesson plan by "Kids Voting USA." We also have a station representative who speaks in the schools and helps educate school children about the voting process. The station also sponsors and runs one of the Kids Voting precincts on election day. In addition, one of our teen journalists from our Explorer Post reports on the Kids Vote throughout our election coverage. These news reports are directly aimed at our young viewers.

SHOWCASE FOR KIDS AND FAMILY - This event is held at our local coliseum and involves 40 to 50 exhibitors who share educational information with children and their parents.

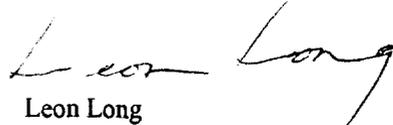
The programs we have offered as examples are just a few of the efforts we are making for the children of our area. These programs are not hidden in obscure time periods, but are televised in prime time or other high viewing dayparts.

As well as all of our locally produced programming, we also broadcast syndicated children's programming like "Nick News" and Disney's "Bill Nye The Science Guy." And, we broadcast a number of public service announcements geared specifically for children.

I hope you will agree that our efforts to reach and educate the children in our community reflect what is happening in the television industry. We don't need more regulations to tell us what or how much to broadcast for our young viewers. We are providing a variety of educational children's programming on our own. We understand the current definition of educational and informational children's programming and are meeting that challenge with enthusiasm!

Think of how well this act is working before you change to a system that measures only the bulk of product and does not recognize the quality or relevance of the effort. Stations like WLOX-TV are making a significant and effective contribution to our children and we request that you not change that which is working.

Sincerely,



Leon Long  
Vice President and General Manager

ccf

xc: FCC - Mr. Reed Hundt, Chairman  
Mr. James Quello, Commissioner  
Mr. Andrew Barrett, Commissioner  
Ms. Susan Ness, Commissioner  
Ms. Rachelle Chong, Commissioner



EX PARTS OF LATE FILED

MM 93-48

DOCKET FILE COPY ORIGINAL

RECEIVED

MAY 21 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

August 22, 1995

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

Dear Secretary:

This letter comes to you from the Portland/Poland Spring TV market to express this station's concern regarding the possible changes in the **Children's Television Act**.

I am advised that there is concern at the FCC that broadcasters do not understand the "current definition" of *educational and informational children's programming*. This station feels the definition to be clear and in need of no change.

Regarding suggestions to place quotas on broadcasters, such requirements appear unnecessary from where we sit. When the fall season begins next month, this station will have increased its *educational informational children's programming* over 300% since 1990.

WMTW-TV will continue to seek out quality educational and informational programming and is currently developing local children's specials.

The FCC has successfully prodded broadcasters into significantly increasing both the quantity and the quality of their children's TV fare and has been successful. Simply to call for an increase in the number of hours, without regard for the quality, and therefore, the appeal for children of volumes of programs, is a disservice rather than of benefit to our youth.

No. of copies received  
LISTARCO

1

Page 2 - WMTW-TV/Children's Programming

If the FCC is to make changes in the Children's TV Act we do recommend that stations be given credit for *short segment programming* of educational or informational children's programming. Thank you for reading my concerns.

Sincerely,

Robert E. Rice  
VP & General Manager

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



900 Whitehall Road, Chattanooga, Tennessee 37405-3249 (615) 267-5412

MM 93-48

DOCKET FILE COPY ORIGINAL

August 23, 1995

REC'D

MAY 21 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Mr. William Caton  
Secretary  
Federal Communications Commission  
1919 M Street NW  
Washington, DC 20554

In re: MM Docket No. 93-48

Dear Mr. Caton :

I strongly urge the FCC to not set numerical quotas for educational and informational programs directed to children. Since the Children's Television Act was enacted, WRCB has significantly increased the amount of children's programming.

WRCB took the Act seriously and acted accordingly:

1. We have a Children's Advisory Panel made of parents, educators, child health and welfare experts and other people knowledgeable of children's issues.
2. We host regularly scheduled luncheons with the panel to develop program topics.
3. We produce local half-hour shows to air during hours when children are available to watch.
4. We make VHS tapes of these shows available to schools free-of-charge.
5. We devised and administered a questionnaire to local children to determine the issues of importance to them.
6. We secured and aired syndicated programming which addresses the educational and information need of children.
7. We developed public service campaigns and news series around issues of importance to children.

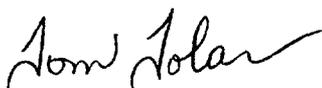
\_\_\_\_\_  
/

There is no confusion at WRCB. We understand the Children's Television Act's current definition of "educational and informational children's programming." Our panel of local experts is in a much better position to tell us what the needs of local children are than would be any well-meaning set of national definitions.

The current FCC rules are working in Chattanooga. There is no need to establish federal quotas for the amount of required programming.

I also urge the FCC to give broadcasters credit for short segment programming which addresses the educational and informational needs of children. We respond to such needs almost every week. We believe these short segment projects are extremely important to our local children. It is only fair that these efforts be recognized in evaluating a broadcaster's overall effort.

Best regards,



Tom Tolar  
President/General Manager

TT:jl

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



EXHIBIT - DATE FILED

21 INTERSTATE COURT • GREENVILLE, SC 29615 • (803) 288-2100 • FAX (803) 297-0728

DOCKET FILE COPY ORIGINAL

R. KENT REPLOGLE  
VICE PRESIDENT/GENERAL MANAGER

August 21 1995

RECEIVED  
MAY 21 1995  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554

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

Re: MM Docket No. 93-48

Dear Secretary:

Although current rules are working to increase children's programming, and in my view do not need to be changed, I would like to comment about short segment programming.

For some reason, those supporting more rules seem to be unwilling to give broadcasters the appropriate credit for short length programming which may be 30, 60, 90 or 120 seconds in length. I would like to offer my station as an example of increased programming for children for which the current rules and the proposed rule would give us no credit.

As part of our Fox 21 Kids Club service we produce and broadcast what we title our "Kids Club Minutes". The Kids Club Minute is a highly produced informational and educational segment that is broadcast twice each day, once during our morning kids programming block and once during our afternoon kids programming block. I have attached a list of the topics we have covered just in the second quarter of 1995. Each day of the week a new piece of information is added to that which has been previously broadcast, so that across a given week a particular topic receives five minutes worth of exposure.

We know that producing these kinds of mini programs and scheduling them as we do has more effect and reaches more children than if we produced a 5, 15 or 30 minute program. We couldn't afford either the time or production cost of longer length programs and our experience tell us they would reach much smaller audiences.

I believe that if those who are looking to see the improvements made in children's programming were to include these kinds of efforts by stations like mine it would be clear that broadcasters across America have responded to the Children's Television Act and have significantly increased the amount of children's educational and informational programming.

One final comment, quotas with regard to any kind of programming are unnecessary and produce government involvement in an area for which it neither has expertise nor, in my view, authority under the first amendment to the Constitution.

I hope my comments are helpful in your deliberations.

Respectfully submitted,

R. Kent Replogle

RKR:d  
Enclosure

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

RKR772

1

**FOX 21 KIDS CLUB MINUTES 1995**

**WEEK 14: HOCKEY (4/3 - 4/7)**

- 4/3 Mike Perkins of G'vl Youth Hockey League gives us an introduction to the sport
- 4/4 Mike Perkins and Matt Herron talk about the first things they learned when they hit the ice
- 4/5 Mike Perkins defines the art of checking
- 4/6 Trivia question "What is SC's professional hockey team and what are their colors?"
- 4/7 How teams can win the Stanley Cup and what is its history

**WEEK 15: HOLLYWILD ANIMAL PARK (4/10 - 4/14)**

- 4/10 Owner David Meeks tells us about Buffy the 2,000 pound bison
- 4/11 David talks about deer from India
- 4/12 David talks about the ostrich
- 4/13 David talks about the kudu and ivex
- 4/14 David talks about the African elephant

**WEEK 16: IAN ZIERING-BEVERLY HILLS 90210 (4/17 - 4/21)**

- 4/17 Ian tells how he landed the part on 90210
- 4/18 Ian discusses how he handles being a role model for kids
- 4/19 Ian talks about an episode which he wrote and directed dealing with Alzheimer's
- 4/20 Ian reminds young people of the importance of a good education
- 4/21 Ian gives advice to kids who want to pursue acting

**WEEK 17: MARCH OF DIMES WEEK (4/24 - 4/28)**

- 4/24 Doctor Ellen Boyd gives a definition of the word 'birth defect'
- 4/25 Jinny Raviotta talks about the special care nursery at Memorial Mission
- 4/26 Former Ambassador mother Pam Maney explains how kids with birth defects are the same on the inside as other kids
- 4/27 Theresa Meadows talks about the March of Dimes
- 4/28 Michael Carpenter, the top youth fundraiser, talks about how kids can help raise money

**WEEK 18: HARD ROCK WRESTLING (5/1 - 5/5)**

- 5/1 Tommy Bell tells us some of the rules of wrestling
- 5/2 Tommy talks about the history of the sport
- 5/3 Young wrestlers tell us what the sport has taught them
- 5/4 Tommy talks about some of the training that goes along with the sport
- 5/5 Tommy tells us what other young kids have to do to get involved in wrestling

**WEEK 19: CAROLINA PANTHERS (5/8 - 5/12)**

- 5/8 Mark Richardson tells us some stars to watch in this first season
- 5/9 Head Coach Dom Capers gives advice to kids who want to make it to the pros
- 5/10 Bubba McDowell has advice for kids who want to go pro and talks about his work with kids
- 5/11 Quarterback Kerry Collins gives advice to kids who want to go pro
- 5/12 Frank Wrike talks about the pros and cons of playing pro ball

**WEEK 20: RIVERBANKS ZOO (5/15 - 5/19)**

- 5/15 Scott Pfaff, curator of herpatology, defines his job
- 5/16 Scott tells us about the radiated tortoise
- 5/17 We learn about the California sea lions
- 5/18 Sue talks about the African elephants
- 5/19 Sue gives advice to kids who may want to work in the zoo

**WEEK 21: TEACHER OF THE YEAR (5/22 - 5/26)**

- 5/22 Overview of the Teacher of the Year award
- 5/23 Focus on Tammy Lerner, winner from Providence Christian Academy in Six Mile, SC
- 5/24 Focus on Denise Johnson, winner from Nancy Hart Elementary in Hartwell, Ga
- 5/25 Focus on Louisa Goebel, winner from Etowah Elemntary in Etowah, NC
- 5/26 Review of all of the winners

**WEEK 22: MACEDONIA ELEMENTARY READING WEEK (5/29 - 6/2)**

- 5/29 1st grader Julia Humphries talks about the books they made
- 5/30 3rd grader Bobby Swanger talks about the type of writing he enjoys most and why
- 5/31 4th grader James Humphries tells kids how to improve their writing
- 6/1 6th grader Kristin Hughes talks about her favorite author
- 6/2 S.C. author Lynn Floyd Wright tells why its important to teach kids about writing

**WEEK 23: NANTAHALA OUTDOORS (6/5 - 6/9)**

- 6/5 Mark Singleton tells all there is to do at Nantahala Outdoors Center
- 6/6 Erik Perkins talks about how he loves to Mountain bike
- 6/7 Forrest King talks about rock climbing
- 6/8 Andrew Holcombe talks about kayaking
- 6/9 Andrew Holcombe talks about how to get yourself back on track if you flip over while kayaking

**WEEK 24: KARATE KIDS (6/12 - 6/16)**

- 6/12 Casey Marks talks about her goal of going to the olympics in karate
- 6/13 Casey and Butch Marks talk about what its like to teach other kids
- 6/14 Butch Marks talks about what the sport has taught him
- 6/15 Casey Marks tells us some of the history behind the sport
- 6/16 Mom, Jeannie Marks, tells us that karate is a sport for everyone

**WEEK 25: TOTALLY TERRIFIC KIDS WEEK ONE (6/19 - 6/23)**

- 6/19 Profile of totally terrific kid, Elizabeth Taylor (flies planes)
- 6/20 Profile of Haley Bradshaw (counsels other kids)
- 6/21 Profile of Lydia Putnam (rides horses, involved in 4H)
- 6/22 Profile Mark Foster ( weightlifter, going to play football at Furman?)
- 6/23 Profile of Michael Colvard (a mini genius)

**WEEK 26: TOTALLY TERRIFIC KIDS WEEK TWO (6/26 - 6/30)**

**6/26 Profile of Michelle Reeves (dances despite her leg problems)**

**6/27 Profile of Jody Blanton (came up with a program to help sick students)**

**6/28 Profile of J.T. Hill (great motivational speaker)**

**6/29 Profile of Melanie Erwin (helped her family while mom was ill)**

**6/30 Profile of Laura Johnson ( a book writer)**



*Secretary  
Federal Communications Commission  
Page 2  
August 24, 1995*

*MM Docket No. 93-48*

*children than could ever be reached by full length programs, since we are not thought of as the children's program station or niche, so, to quantify a requirement would actually decrease our effectiveness.*

*In summary, I believe in the principles that have prospered this country---free speech and free enterprise---the present rules are somewhat counter productive to these principles and the proposed rules will be extremely counter productive to these two principles that have been proven by use for over 200 years!*

*Please drop any consideration of numerical quotas for children's programming.*

*Sincerely,*



*Joe Macione, Jr.  
Executive Vice President/General Manager*

*JM:jb*

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

27-11-95 11:58 AM FILED



A CBS AFFILIATE

WAYNE M. MARTIN  
President/General Manager

DOCKET FILE COPY ORIGINAL

August 29, 1995

RECEIVED

MAY 17 1996

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

Dear Secretary:

In regards to FCC "MM Docket No. 93-48. I would like to voice my opposition to the new FCC rules, including possibly setting numerical "quotas." The Children's Television Act and the current FCC rules are working to increase children's programming and new rules are unnecessary. Station's are averaging over four and one-half hours of regularly scheduled children's educational and informational programs per week. This leads me to believe that broadcasters are certain of their obligations and are taking their responsibility seriously. Surveys suggest the amount of regularly scheduled and informational children's programming (30 minutes in length or longer) has increased dramatically (over 80%) since the Children's Television Act went into effect.

Broadcasters' understand that the FCC wants to ensure the primary objective of children's shows is educational and informational, and entertainment concerns take a secondary role. The FCC, however, should consider that when children do not enjoy shows, they do not watch them. And when they're not watching, they're not learning. Can broadcasters afford to produce "educational" shows that kids won't watch simply to fulfill a mandate based upon a subjective definition? Few stations can afford to do locally produced educational programs, so most rely on distributors and the network.

The FCC should also take into consideration that not only are broadcasters airing two to four hours of educational programming per week - but spending huge sums with distributors. Stations are buying programs designed to spur interaction between

SEARCHED  
SERIALIZED  
INDEXED  
FILED

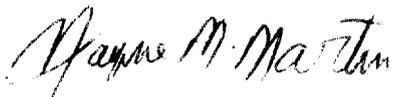
Secretary  
Federal Communications Commission  
Page 2

stations and schools to serve and educate the children in their areas. "Student Body," "Weatherschool," and "News 101," are just a few of the avenues used to provide information about nutrition, fitness and weather. Stations supply free educational kits and software to participating schools and teach students the use of broadcast equipment to write, shoot, and edit news stories of interest to teens. (Note: WKYT-TV participates in all the above).

Short-subject programs can be educational. When dealing with attention spans of children, (it's a matter of diversity and the variety of programming), educational wraparounds can be highly effective in pure entertainment programs. Public service spots rotated within our highest-rated entertainment programs, expose large numbers of children to critical concerns such as: safety tips for latchkey children, how to answer the phone when you are home alone, or to acceptance of individual differences by portraying physically challenged youngsters.

Rules quantifying the amount of programming for children are unnecessary -- broadcasters are responding to the Act and their obligations.

Sincerely,



Wayne Martin  
President and General Manager

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

141493-48



ALABAMA'S NEWS SOURCE

EX PARTE OR LATE FILED

DO NOT REMOVE ORIGINAL

12 EAST DELANO AVENUE • MONTGOMERY, ALABAMA 36105 • 334 / 288-1212

September 1, 1995

Mr. William F. Caton, Secretary  
Federal Communications Commission  
1919 M St., N.W., Room 222  
Washington, D.C. 20554

RECEIVED  
MAY 21 1996  
FEDERAL COMMUNICATIONS COMMISSION

Dear Mr. Caton:

I am very concerned that the FCC is considering a change in the Children's Television Act (MM Docket No. 93-48), which would possibly establish numerical "quotas" for educational and informational children's programming. Over the last several years, broadcasters have significantly increased children's programming in response to the Children's Television Act.

WSFA in Montgomery, Alabama has and does broadcast programs that serve children's needs. Consider the following examples:

**"Nick News"** - An award winning magazine show for children, hosted by veteran journalist, Linda Ellerbee. The program is recommended for viewing by the National Education Association.

**"Bill Nye, The Science Guy"** - This show makes fun with fast-paced, outrageous demonstrations and hilarious humor. The program combines the excitement and surprises kids love with the enriching learning experience the Children's Television Act sought to encourage. Additionally, Bill Nye enjoys the full support of the National Science Foundation.

The entire NBC Saturday morning lineup, which includes **"Name Your Adventure," "Saved by the Bell," "Hang Time,"** and **"California Dreams,"** is broadcast weekly. These shows deal with a wide range of subjects which affect the youth of America.

**"Get A Clue"** - In addition to these programs, we are working with our seven "sister" stations in the Cosmos Broadcasting family to produce an educational children's show called "Get A Clue." In just a few

0



**Mr. William F. Caton, Secretary**  
**September 1, 1995**  
**Page 2**

*short weeks, we will broadcast our first show, which teaches children about ship navigation by taking them on a scavenger hunt that is all linked to their local library, computers, and a mythical pirate.*

*Examples of general audience programming which contributes to satisfying children's educational and informational needs include:*

***"NBA Inside Stuff"***  
***"National Geographic" specials***  
***"Rediscovery of the World" specials***

*I also believe broadcasters deserve and must get credit for short segment programming and non-broadcast efforts, which are extremely important in getting messages out to our children and grandchildren.*

*WSFA's efforts in these areas that certainly support the Children's Television Act range from "The More You Know" campaign to a special arrangement with a local cable system to broadcast the very popular "Disney Afternoon" programming. An explanation of examples follows:*

***"The More You Know"*** - January 1995 marked the launch of NBC's third annual "The More You Know About Violence Prevention" campaign effort. This effort focused on issues surrounding violence prevention, family violence, and conflict resolution. A Poster/Study Guide was developed by NBC and distributed to principals of all public and private junior high schools, as well as to legislators across the county. This Poster/Study Guide focused on youth violence as an epidemic in our society.

***"30 Years of National Geographic Television"*** - A study guide was developed and provided by National Geographic Television in cooperation with NBC. The guide included a program summary, education objectives, and a list of classroom activities for students.

*WSFA has negotiated with Buena Vista Television for the "Disney Afternoon" of children's cartoons and "Sing Me A Story at Belle's Book & Music Shop," which we provide to TCI Cable of Alabama to air on their local origination channel (3). The afternoon slate airs 2:30-4:30 p.m., Monday-Friday, and "Belle's Book and Music Shop" airs Sundays, 8:00-8:30 a.m.*

**Mr. William F. Caton, Secretary**  
**September 1, 1995**  
**Page 3**

*Informative tips and behavioral messages under the title "Inspector Detector," which were produced by the local Kiwanis Club, are aired during the "Disney Afternoon" commercial breaks. These informative messages are also aired on WSFA's highly watched morning show, "Today In Alabama."*

*The programs we have offered as examples are just a few of the efforts we are making for the children in our viewing area. In addition, we broadcast a number of public service announcements targeted specifically for children.*

*I hope you will agree that our efforts to reach and educate the children in our community reflect what is happening in the television industry. We do not need more regulations to tell us what or how much to broadcast for our young viewers. We are providing a variety of educational children's programming on our own. We understand the current definition of educational and informational children's programming and are meeting that challenge with enthusiasm!*

*Think of how well this act is working before you change to a system that measures only the bulk of product and does not recognize the quality or relevance of the effort. Stations like WSFA-TV are making a significant and effective contribution to our children and we request that you not change that which is working.*

*Cordially,*

WSFA



*J. Harold Culver*  
*Vice President & General Manager*

JHC/tw

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



EXHIBIT IN LATE FILED

DOCUMENT FILE COPY ORIGINAL

FEDERAL COMMUNICATIONS COMMISSION  
MAY 21 1995  
WASHINGTON, D.C.

August 31, 1995

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

Re: MM Docket No. 93-48

Dear Mr. Secretary:

This year marks my 30th year in broadcasting. I have been proud in the past, am currently proud, and I'm sure will be proud in the future of the role broadcasting has played in educating, informing and entertaining our citizens. I include in that our children. Clearly, broadcasters have a special responsibility when it comes to the programming designed for our younger viewers.

While, as managers, we need to be actively involved in what we put on our air, we do not need the FCC to tighten its rules implementing the Children's Television Act, which might possibly include the setting of numerical quotas for children's programming.

While I can only speak from the standpoint of what we do at our station, I know from my years in this business how careful broadcasters are in not only scheduling programming for children but in seeking opportunities within their individual communities to be involved in projects directly benefiting our young viewers, projects such as joint reading programs with local libraries, promoting science fairs or being involved with special science projects at local science museums, special campaigns and/or PSA's built around safety including but not limited to sports safety, bicycle safety, school safety, traffic safety, and the list goes on and on. I might add that all these projects and/or campaigns are treated as PSA's and no one in the community is charged. It's something the broadcaster feels a responsibility to provide.

We do not need new rules quantifying the amount of children's programming. What we need is for the Commission to encourage and support broadcasters in their quest as we diligently work within our individual communities to be responsive and responsible to the needs of all our viewers, including children. This also includes short segment programming. I'm sure I don't have to remind you that

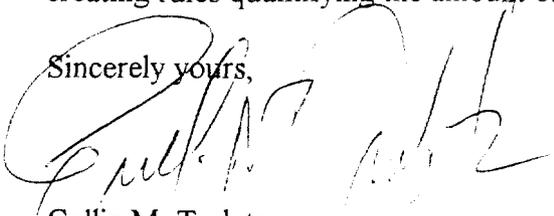
One Television Place  
Charlotte, NC 28205  
(704) 372-1800  
FAX (704) 376-3415

Page 2  
Secretary, FCC  
September 1, 1995

sometimes a child's attention span is not 30 minutes or one hour. Short segment programming can have a terrific impact and can drive home the point much more effectively than longer segment programming; therefore, please do not take away our ability to make a difference by not giving us credit for short segment programming.

As I stated at the beginning, I'm proud of what broadcasters do for our young viewers. The Commission likewise should be proud and should encourage broadcasters and not hamper us by creating rules quantifying the amount of educational and informational children's programming.

Sincerely yours,



Cullie M. Tarleton  
General Manager

CMT/mkl

cc: Chairman Reid Hundt  
Commissioner Jim Quello  
Commissioner Andrew Barrett  
Commissioner Susan Ness  
Commissioner Rachelle Chong

MM 93-48

August 30, 1995

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



RE: Children's Television Act - MM Docket No. 93-48

Dear Secretary,

DOCKET FILE COPY ORIGINAL

WYFF Television is an NBC Affiliate serving the Greenville-Spartanburg-Anderson, South Carolina, and Asheville, North Carolina market. We offer a total of four hours of educational/informational programming each week specifically targeted to youth. The programs are:

- "VIDEOMAX" - Local
- "Captain Planet" - Syndicated
- "Jack Hanna's Animal Adventures" - Syndicated
- "California Dreaming" - Network
- "Saved By The Bell" - Network
- "Fastbreak" - Network

"VIDEOMAX" is a locally produced thirty minute program that airs Saturdays at 11 a.m. The program targets youth ages 11-16. "VIDEOMAX" first premiered in March '92 as a monthly show; our goal from the start was to produce a quality program that would showcase positive accomplishments of our local children. We felt to begin monthly and grow to weekly would assure quality; "VIDEOMAX" has been seen weekly since January '95. The South Carolina Broadcasters Association awarded "VIDEOMAX" the Local Children's Programming Award for '95.

Local broadcasters understand the importance of producing quality children's programming. However, if quotas are imposed the end result may be more, but not necessarily better, programs for our children. Every three months WYFF prepares a thorough overview of what we have accomplished to meet and exceed the expectations of the Children's Television Act. The on-air programs are vital; however, the non-broadcast efforts and the short forms of programming produced should not be overlooked or judged to be ineffective.

Here are a few examples from our FCC Second Quarter '95 Report: WYFF News 4 talent and staff personnel collectively participated in 113 outreach events in three months to local students through classroom participating, station tours, tutoring, guest speak appearances, sponsorship of events for youth, i.e. "Special Olympics", "Baby and Children's Expo". For the entire school term News 4 weekly recognized outstanding athletic and academic achievements of our teens through "Prep Spotlight" a 1:45 segment in our 6 p.m. newscast. Public Service Announcements

P.O. Box 788 · 505 Rutherford Street · Greenville, South Carolina 29602 · Phone 803/242-4404 · Fax 803/240-5329

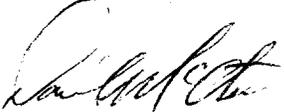
A Pulitzer Broadcasting Company Station · An Equal Opportunity Employer

Children's Television Act  
August 30, 1995  
Page Two

specifically targeted to reach youth with messages such as; stay in school, underage drinking, racism, prom night, drugs, boy and girl scout messages. These messages collectively aired 269 times in a three month period.

The Children's Television Act is and will continue to be successful. It has accomplished the goal of motivating and challenging local broadcasters to be proactive and responsive to the entertainment and educational needs of our children. More rules and/or quotas are not needed at this time.

Sincerely,



David F. McAtee  
Vice President/General Manager

DFM/gm

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

# KOLR 10

Independent Broadcasting Company  
Post Office Box 1716  
Springfield, Missouri 65801-1716  
(417) 862-1010

Ellis Shook, Vice President  
General Manager

DOCKET FILE COPY ORIGINAL

FEDERAL COMMUNICATIONS COMMISSION  
MAY 21 1995

August 31, 1995

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

RE: MM Docket No. 93-48

To Whom It May Concern:

This letter is with reference to the proposed rule making dealing with the "Children's Television Act" and further rule making by the FCC

It is my sincere hope that you will drop or severely modify your plans for additional regulations about Children's Television Programming.

First of all, there have been numerous studies showing that the age group that you are talking about is extremely difficult to reach on television. Most of the programming seems to satisfy adults, but the children are not there to watch it. That does not mean we should not do children's programming that is meaningful, but over the last couple of year's broadcasters have manifestly demonstrated that they are doing much more programming that deals with "educational and informational children's programming."

I would urge you to take a much more contemporary approach to television and take advantage of its strengths which are primarily being "intrusive." That is a term that generally is applied to commercials, but if you would give program recognition to thirty, sixty, ninety or two minute messages that really address the area of educational and informational programming, these announcements would find the children who are watching sitcoms, dramatic shows, children's programming or any other program forms where children are watching.

It is very difficult to quantify quality. Since 1934 we have not been able to define the "public convenience interest and necessity." Isn't there a lesson to be learned from that?

1  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20541

Page 2

Another major point is to find a way to address those few broadcasters who are not fulfilling the intent of the law and the rules. Don't simply create a new set of problems for those broadcasters who are doing a good job, and find a way to recognize and encourage them.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in cursive script that reads "Ellis Shook".

Ellis Shook  
General Manger

ES:ms

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