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97-138

From: Hal Kneller <kneller@sunline.net>
To: Alan Moskowitz <AMoskowitz@kayescholer.com>, Jim W...
Date: 6/28/98 11:46pm
Subject: Main Studio/Public File rulemaking

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JUN 29 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Chairman Kennard and FCC Commissioners:

I am a small market commercial broadcaster. Our two Class A FM stations serve a population of well under 20,000 in their 1 mV/m contour. The purpose of this e-mail is to request your assistance in finishing some old business pending before the Commission. That business is MM Docket No. 97-138, main studio and public file rule changes, instituted by the Commission itself in May, 1997.

As a small market broadcaster, we, too, have consolidated. But we need one small measure of relief to make our organization far more efficient. We need for the Commission to move on the main studio and public file rule changes that were proposed quite some time back. We believe these proposed changes make sense and benefit the public, the Commission and the broadcasters. As it stands now, our existing studios will not be legal for our new Nocatee station, by less than 2 miles! So, we will have the burdensome requirement of setting up a *main studio* in a separate location and staffing it to meet antiquated rules which do not make sense in today*s environment. However, those rules remain in force.

It is not my intention to make this a long letter. It is simply to please ask you to examine why this action seems to have stalled somewhere in the *system*. Any reform in this area would be most welcome by the broadcasters, and to the public as well. For example, right now someone can visit our offices for the public file for WZSP and be told, *Sorry, it*s at Grimsley*s Citgo station in Nocatee.* Why is it at the gas station in Nocatee? Because the public file rule requires it to be in the community of license, and not at the main office. The public has no clue as to the location of this file unless they come to us and ask. The Commission doesn*t know where this public file is, either, for that matter. But, if the public file were required to be at the main studio, then everyone will KNOW where it is, since the main studio location is public record. Of course, we also need the main studio location relaxed per plan, as well.

Thank you for reading this, and thank you for your early consideration of this matter.

Respectfully,

Harold M. Kneller, Jr.
President
Heartland Broadcasting Corp.
WZZS Zolfo Springs, FL
WZSP Nocatee, FL

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