

89.7



WCPE

Great Classical Music, 24 Hours A Day

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December 7, 2000

Chief, Mass Media Bureau
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Dear Sir,

Enclosed please find a courtesy copy of our formal comments in reference to a Notice of Proposed Rule Making in the matter of Making Public File Information Available on Station Web Sites, FCC 00-345, dated September 14, 2000.

Please contact me immediately if any additional material or clarification is desired.

Thank you for consideration of our opinions and suggestions.

Sincerely,

A handwritten signature in cursive script, appearing to read "D. Proctor".

Deborah S. Proctor
General Manager

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A handwritten mark or signature, possibly a stylized "D" or "O", located above the distribution list.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:) FCC 00-345
)
Making Public File Information)
Available on Station Web Sites)
)
Notice of Proposed Rule Making)
and Order) September 14, 2000

Comments of Educational Information Corporation

Educational Information Corporation is the licensee of WCPE, 89.7 FM in Raleigh, NC. WCPE is a 100% listener-supported public non-commercial FM radio station which does not receive any tax-derived or Corporation for Public Broadcasting revenue at all.

We have put a great amount of effort into placing every letter, document, and required filing into our public file. Since our inception, our public file has grown to fill eight half-height cabinets and we estimate it contains over thirty thousand pages, mostly letters from the public.

Even though it appears that the proposed Rulemaking may only apply to commercial television stations, regulatory burdens always appear to grow, not to diminish. We are panicked by the prospect of having to put all of our public file material onto the Internet. We don't have the electronic storage space to do this, nor do we have the staff time to scan the material into electronic format.

As far as the issue of "ease" is concerned, we further wish to point out to the Commission the great number of errors, omissions, and misleading information which continues to appear on the Commission's own web site. The Commission should know from its own experience that maintaining an accurate web site is no easy matter. The Commission's stand that the creation of such a web site "would not be unduly burdensome" could not be farther from the truth -- it would be an expensive nightmare for us.

Perhaps the day will come when the public desires daily perusal of a station's public file and when the public file of a station has people standing in line to view it. But that day has not yet come, at least for our station. Is there widespread evidence this has become a problem for some classes of stations?

We ask that the Commission stay this proceeding until the day that enough verified response comes from the public to demonstrate that it is commonplace that the public files of a statistically significant number of broadcast stations frequently can not be viewed because of long lines of people waiting to use the public file depositories of broadcast stations. Then, it should be decided what classes of stations need to make what classes of material available on the Internet.



Deborah S. Proctor
General Manager, WCPE
President, EIC

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