I am a former commercial radio worker. I am opposed to efforts by the Federal Communications Commission to further deregulate the commercial media through the relaxation and/or elimination of ownership limits, especially in radio and television. The relaxation or elimination of such limits would hurt more people than it would help. Such unnecessary deregulation would lead to higher advertising costs, which would result in small businesses being priced out of the media advertising market. Further deregulation would also result in the loss of literally thousands of jobs, and hurt our economy.

The Telecommunications Act of 1996, which brought about the unneeded deregulation of the commercial broadcast industry, has been a job-killing piece of legislation. Since 1996, deregulatory policies have cost the American economy literally thousands of jobs. Nearly 12,000 of those have been in the commercial radio industry (myself included). I don't think further deregulation would be in the best interests of the American media, nor would it be good for the economy.

The Telecom Act has brought about the illegal monopolistic practices embraced by companies like Clear Channel Communications. Such practices have resulted in higher advertising rates, unnecessary job cuts in favor of an unproven form of programming called "voicetracking" (which is against FCC Rule 73.1208, Section A) which have been proven to lower the station's ratings, charging even not-for-profit organizations to air public service announcements (which are supposed to be free of charge), and the proliferation of immoral and unethical on-air and off-air employment policies (such as keeping those accused of sexual harassment on the job while firing the accusers or keeping a shock jock on the air even though he has been accused of a felony). So-called "shock radio", especially the sexually driven variety of Howard Stern or the bloodthirsty style of Bubba "The Love Sponge", should never have been allowed in the first place. Now, why would you use morning radio to do play-by-play of something that should only be confined to the privacy of one's own home, or to kill an innocent, helpless animal? I see no reason for this. Also, Clear Channel has abused it's power in the music and concert businesses by keeping music by local acts off the commercial airwaves, as well as not allowing airplay for music acts who do not use Clear Channel Entertainment to promote their concerts and use Clear Channel's venues to hold these concerts (the most notable person abused by Clear Channel's bullying has been pop singer Britney Spears). This is a blatant and unwarranted perversion and abuse of the First Amendment.

Discrimination continues to run rampant in commercial radio; for example, homegrown talent, former public, college and small "mom-and-pop" station air talent have not been given the opportunities they have worked hard for years to earn. Patronage, cronyism and nepotism ("it's not WHAT you know, it's WHO you know") is a policy still largely in use in the commercial media; I see this policy as a dated policy that has kept many qualified people (myself included) from holding down well-paid positions in the commercial media. This has created an industry that has way too few "haves" and far too many "have nots", a totally un-American concept. I don't think Howard Stern should be paid $20 million per year; regardless of ratings, I don't think he's worth even one-tenth as much. I strongly believe that discrimination on the basis of local origin, especially in commercial broadcast employment, along with the use of patronage, cronyism and nepotism, should be permanently banned in the United States. In addition, there really should be a cap on the salaries of on-air personalities, so that those in sales and in less desirable time slots (such as overnights) can have a fair chance to make an honest living in the radio business.

Workers with disabilities have been hurt most by the deregulation of the commercial media (especially radio). Many commercial radio stations I've visited

between 1990 and 2001 did not have their studios and offices in compliance with the guidelines outlined in the Americans with Disabilities Act of 1990. Many stations are still not accessible for those confined to wheelchairs; others will not allow for workers with even minor disabilities (such as learning disabilities) to have access to commercial broadcast employment, regardless of whether that employment is in an on-air position or a support position (such as a computer technician). Currently, the unemployment rate among workers with disabilities in the general population is an artificially high 70%. The commercial media, through it's employment practices, have shut out more qualified workers through their negative attitudes toward workers with disabilities. Commercial radio station owners (especially those owned by major corporations) don't realize that they can get a tax break for hiring a person with a disability, and that the government is willing to underwrite 50% of the cost of adapting the station's studios and offices to comply with ADA guidelines. Making these reasonable accomodations would improve a station's community image; not doing so would make the station look bad in the eyes of the community at large.

The Telecommunications Act of 1996 has done nothing to encourage competition in commercial broadcasting, nor has it done anything to encourage diversity in ownership and employment. Too much of radio is concentrated in fewer hands; such concentrations are a threat to diversity in ownership. Minority ownership has been reduced; fewer African-Americans are owning radio stations now than prior to 1996. Far fewer Asian-Americans own radio stations; other minorities are being shut out of ownership opportunities. The same minority groups also have fewer opportunities for employment in commercial radio, and even fewer opportunities for advancement. Workers with disabilities are practically shut out of commercial broadcast ownership and employment opportunities, and have practically no opportunities for advancement. Restoration of limits on the number of stations one company can own will lead to more ownership opportunities for ethnic minorities and more employment opportunities for these same minorities and workers with disabilities.

Unproven technology has also been moved to the forefront since the Telecom Act was passed. The technology known as In-Band, On-Channel Digital Audio Broadcasting (IBOC-DAB), being pushed by iBiquity, is a massive failure. The AM and FM bands, on which this technology would be used, is not suited for digital broadcasting. The most appropriate place would be the L-Band at 1.4 GHz (1,400 MHz); this band is more suited for digital audio broadcasting than the AM and FM bands. AM and FM must remain broadcasting in an analog format. IBOC-DAB would force a majority of smaller broadcasters, which more people are depending on for diversity in viewpoints, community-oriented programming and music not available on corporate radio, off the air. Instead, existing technologies, such as Compatible Quadrature Amplitude Modulation (C-QUAM) AM stereo, developed by Motorola, should be strongly encouraged. AM stereo broadcasting has been proven in over two decades in the field; it provides for better sound quality than IBOC-DAB. Americans certainly don't want radio that sounds like it's being streamed on the Internet; this is basically what IBOC-DAB is.

One thing that continues to irk me is the loose policies concerning the counting of non-commercial radio experience as actual work experience. There should only be one policy for all radio stations; that of requiring all radio stations to count experience with non-commercial educational radio stations as actual work experience. Since a number of stations still won't count non-commercial radio experience as actual work experience (after all, working at a non-commercial radio station IS actual work experience), I have not had as successful of a career as I would like. There are many more like me who have struggled terribly

to make an honest living in the radio business; many are more talented than those commercial radio continues to put on the air (especially those who consistently break FCC rules by presenting programming that is deemed to be indecent, such as these "shock jocks").

Another thing that angers me is corporate entities owning religious radio stations. I don't think it's morally right for a company such as Clear Channel Communications or Infinity Broadcasting to own radio stations that format religious programming (such as African-American Gospel, Southern Gospel, Contemporary Christian or even a format oriented toward a particular Christian denomination or non-Christian religion). These stations are supposed to be a community religious outreach, not an instrument for profit. Religious stations should only be owned by those who are committed to their faith, such as churches, synagogues, mosques, not-for-profit organizations promoting religious values, and committed Christian businessmen and women. Using religious radio stations as a vehicle for profit violates various tenets of Christian, Jewish and Islamic law. I can point to two verses of the New Testament. The first is from 1 Timothy 6:10: "For the love of money is the root of all evil". Another is from Matthew 6:24: "No one can serve two masters. He will have either hate one and love the other, or devoted to one and despise the other. You cannot serve God and mammon". I strongly believe that these so-called "religious" radio stations owned by corporate entities (such as Clear Channel and Infinity) are serving mammon, not God. An Old Testament example of the evil of using a religious radio station entirely for profit can be found in Deuteronomy 8:6-20.

There really should only be one interpretation of FCC rules: a strict, absolute and literal interpretation of FCC rules. If the FCC interpreted the rules like a Southern Baptist interprets his/her Bible, then we wouldn't have personalities like Howard Stern, the Greaseman, Bubba "The Love Sponge" and Opie and Anthony polluting our airwaves with filth. Under a strict, absolute and literal interpretation of FCC rules, radio would be much, much better; the First Amendment wouldn't be perverted and abused as it is now. Radio would be listenable if the FCC's rules were interpreted literally.

I have been severely affected by the Telecommunications Act. I have not been working in commercial radio since Coltre Broadcasting Company sold WFUN-FM Bethalto, IL (95.5) in 1999. Since I was born and raised in the St. Louis area, I have faced endless discrimination in the commercial radio business in the St. Louis market since being fired from WFUN-FM primarily because I am considered "homegrown talent". In other words, I was born and raised in St. Louis, and was trained for the radio business there. I have proven myself as a valuable worker at every station I have worked at. From the time I started at KCFV Ferguson, MO (89.5 FM) in 1985, I have dedicated myself to playing the radio game by the FCC's rules and regulations. I worked my tail off in Christian radio at WFTD Marietta, GA (1080 AM), in a block-programmed format with WGHR Marietta, GA (now off the air), in the News/Talk format (as an engineer) with WGNU Granite City, IL (920 AM) and in the Pre-Teen format at the aforementioned WFUN-FM, and in the Mainstream Jazz format at my present station, WSIE Edwardsville, IL (88.7 FM). Did that hard work pay off in a job in corporate radio? It did not. While most people my age (36) make five-figure annual salaries, I have never been able to make more than $5.50 per hour in the commercial radio field. This artifically low salary was despite the fact that I hold an Associate of Arts degree in Communication Arts with emphasis on Broadcasting. I have since given up the pursuit of a Bachelor of Arts degree in Mass Communications (specializing in Radio and Television) in favor of another field, given the industry's continued poor job outlook. I also was not given guidance or job leads by those I have worked with in the past; this underscores the need for job placement services

for Mass Communications students (especially those specializing in Radio and Television) at the nation's colleges and universities. Of all the tapes and resumes I sent to corporate broadcasters, very few of them even resulted in any contacts from station management. Most of my commercial experience has come with independent broadcasters. In addition, I did not know anyone in a position of making personnel decisions in the commercial radio industry (especially in corporate radio). Not even the National Association of Broadcasters' Employment Clearinghouse made an honest effort to place me in radio employment. I faced the same troubles finding on-air work in the small markets near Atlanta, GA during the early 1990s; resulting in my decision never to do radio outside the St. Louis area after returning there in 1992. In other words, I decided against pursuing a radio career outside St. Louis, where I was born and raised. This is also due in part to the fact that the majority of my family lives in the St. Louis area; the commercial media, in my honest opinion, is also anti-family. I have resigned myself to the fact that I cannot work in commercial radio as long as the business continues to practice discriminatory policies that have kept me (and others like me, who have worked hard for years and followed FCC rules to the letter to earn a spot in commercial radio) from making an honest living. I not only got into radio to make an honest living, but also to use my experience as a DXer (and later, as an Amateur Radio Operator) to benefit the station's relationship with the DX community, get as far in the business as I could, and most importantly, to serve the community at large. Telecom has largely been to blame for the irreparable damage done to my career.

Further deregulation of the media would cost this economy hundreds, if not thousands, of jobs; something our economy simply doesn't need. Our economy has suffered enough job losses as it is, especially since the terrorist attacks of September 11, 2001. We don't need any more job losses; further deregulation of the media would bolster the number of job losses nationwide. Many of those fired since Telecom went into effect have not been able to find employment with other radio or television stations. The restoration of ownership limits would create new jobs for many of these people who were disenfranchised because of Telecom '96.

Further deregulation of commercial radio is a recipe for economic disaster. Many more lives will be shattered because of lost jobs. Corporate dishonesty continues to run rampant; I no longer believe anything Clear Channel Communications says, for example. Further deregulation means lower salaries for the worker, higher advertising costs, higher unemployment, continuation of policies that violate federal anti-trust and anti-discrimination laws, and could open the doors to a flood of lawsuits. Clear Channel has been flooded with most of these lawsuits since Telecom was passed, ranging from breach of contract to anti-trust violations. Personally, I have also had a bad experience with Clear Channel: they wouldn't let me apply for an on-air job at KLOU (103.3 FM) St. Louis, MO in the summer of 2000.

The media desperately is in need of positive change. Further deregulation of the commercial media is a change for the negative. Some ideas I have for positive change in the commercial media:

1) Hire at least 40% of on-air talent from WITHIN the market, using college and public radio stations as a source for new talent, in addition to the smaller market stations. End all discrimination on the basis of local origin.

2) Require all DJs to STRICTLY ADHERE to FCC rules and regulations on program content (especially the rules forbidding on-air indecency). We don't need more Howard Sterns, Bubbas, Opies and Anthonys.

3) Only one interpretation of the FCC rules would be right: a LITERAL and ABSOLUTE interpretation of the rules.

4) End all discrimination against people with disabilities in employment in the commercial radio business, especially in support positions.

5) Require ALL radio stations, REGARDLESS OF SIZE, to adapt their offices and studio facilities for wheelchair access, as required by the Americans with Disabilities Act.

6) A permanent ban on voicetracking; all stations should be required to have an actual person on the premises 24/7/365. If the station won't hire overnight board operators (for syndicated programming) or on-air talent because of financial constraints or the excuse that the shift "isn't salable" would be required to be off the air (as in studios and transmitter turned off) during those hours.

7) Encourage continued development of existing technologies (such as C-QUAM AM stereo), use the L-Band (in the 1.4 GHz spectrum) for terrestrial Digital Audio Broadcasting (as is the case in Canada), and end all development of IBOC-DAB.

8) A permanent ban on the use of patronage, cronyism and nepotism as a hiring policy (the only exceptions would be the few so-called "mom-and-pops"). Require all broadcasters to count non-commercial radio experience (including college radio) as actual work experience.

9) Corporate entities who are not committed to a religious faith should not be allowed to own religious radio stations; ownership of such stations should be restricted to churches, synagogues, mosques, not-for-profit organizations promoting religious values, and committed religious businessmen and women.

10) Most of all, RESTORE OWNERSHIP LIMITS for commercial operators! No more than 100 stations nationwide, and no more than four per market (exceptions to the "four per market" limit would only be made for those willing to exclusively serve underserved suburban areas). Non-commercial educational broadcasters would be the only ones excluded from such limits.

Please resist the demands of the National Association of Broadcasters, who are not acting in the best interests of the United States and it's economy. Please resist the demands of the corporate broadcasters. Say "NO" to further deregulation the commercial media. Your opposition to further deregulation of the commercial media will save hundreds, if not thousands of jobs; lead to the restoration of diversity in media ownership and employment, and make the media look much better in the view of the American public. Your opposition further deregulation is in the best interests of the United States and our economy.