-Before the

Federal Communications Commission
Washington D.C. 20554

Reply to comments made concerning the matter of:

2002 Biennial Regulatory Review —Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to section 202 of the Telecommunications Act of 1996	MB Docket No. 02-277
Cross-Ownership of Broadcast Stations and Newspapers	MM Docket No. 01-235
Rules and Policies Concerning Multiple Ownership of Radio Broadcast Stations in Local Markets	MM Docket No. 01-317
Definition of Radio Markets	MM Docket No. 00-244

To The Commission:

Response by Prairie Air Incorporated
WEFT-FM Board of Directors

Dated January 31, 2003

WEFT-FM, a locally owned and operated independent radio station in Champaign, Illinois herein officially opposes relaxation of the ownership rules being considered in the biennial regulatory review by the Federal Communications Commission.

Having noted the responses to the proposed changes by corporations owning media but not residing in our local market (see proceeding 00-244 Sinclair Broadcasting and 00-244, 01-235, 02-113, Nexstar Broadcasting) we take exception to comments arguing that our "media marketplace is amazingly diverse" (Nexstar), that "local programming would increase" if the rules were relaxed (Nexstar) and that retention of the current (minimal) FCC rules is "Not 'necessary in the public interest.'" (Sinclair)

Regarding MM Docket Nos. 01-317 & 00-244, our local media, specifically radio stations in our broadcast market, are already dominated by absentee owners who program from afar with little interactive capacity. The radio shows are too often pre-recorded, not allowing listener input. The radio news staffs locally could

generously be called minimal and accountability to the community in any direct way other than through radio listener polls to determine advertising dollars is unacceptably low. Further dilution of the FCC regulations governing absentee ownership will not improve media diversity as these corporations suggest

Regarding MM Docket No. 01-235, we are also concerned about the proposed relaxation of cross-ownership rules within our market. Our local area, Urbana-Champaign, has only one daily newspaper, having lost the other competitive daily in 1980. Further, we have just this month lost our local weekly newspaper. Allowing the single newspaper, with its virtual print news monopoly, to own broadcast stations here would certainly not encourage the kinds of diverse opinion necessary for informed citizen participation in political debate. Quite the contrary.

If the claim, as it appears to be, is that loosening the rules will actually increase competition and thus increase the numbers and kinds of voices on the air, then to make such an argument is to twist reason beyond recognition. As journalist Neil Hickey wrote in the Columbia Journalism Review about the earlier loosening of FCC regulation of ownership in the 1996 Telecommunications Act:

> "Thus the question presents itself like a Japanese koan (the scrupulous contemplation of which may or may not lead to enlightenment): how is it possible for fewer and fewer owners to generate greater and greater competition?" (available: http://www.cjr.org/year/97/1/telecom.asp)

That act has neither enhanced diversity nor improved other aspects of the public interest, and these proposed changes will further erode the possibility of informed citizen involvement in political action—involvement that was clearly intended by the constitution.

Further, the preponderance of academic studies cited by the corporations owning media from a distance is suspect. We agree with Professor Jay Hamilton in his response to your proposed changes when he questions the claims by media owners that there is already adequate diversity in the media environment. As he notes, these claims are not sufficiently supported by the studies cited.

> "A statistical analysis of the kind used in these studies only goes so far in providing an adequate understanding of the dynamic, multifaceted relationships between media ownership and diversity.
>
> What is needed is a much more sophisticated and thorough view of this exceedingly complex relationship. " (see comment to commission by Jay Hamilton: **Notice of Proposed Rulemaking, MM Docket No. 02-277, rel. Sept. 23, 2002)**

While the corporations claim current rules infringe on their first amendment rights (Sinclair), it is clear that the very foundation of free expression for the individual

citizen is threatened to a much greater degree should the commission allow these corporations to further expand into local markets and shrink the variety of voices we citizens hear. The availability of diverse---and local---information is crucial to the spirit of the first amendment.

Submitted on behalf of the WEFT Board of Directors by Board member, Ivy Glennon, Urbana-Champaign, Il.