

As an investigator, specializing in complex corporate fraud and ethics issues, I strongly OPPOSE the proposal to increase the limits of ownership (and domination) of broadcast companies. Such a drastic change will set in motion further upheaval in an industry beset by trauma. Besides bolstering the broadcast oligarchies with the support of unchecked monopoly building, this action will compound the difficulties facing other regulatory bodies such as the SEC. We have not even been able to work through the problems that facilitated the accounting scandals that prompted Sarbanes-Oxley. The SEC vote on May 27, 2003 to require that executives certify that their companies have adequate controls to prevent and detect accounting violations underscores the infancy stage we are in as we all grapple with the SYSTEMIC problems of public accountability.

What controls are in place that validate that Chairman Powell's recommendation will not compound corporate leadership problems? We know that ClearChannel, for one, has a history of intensely "incestuous" relationships, from their Board of Directors to their government "friends". They went from a "family" business to a "pseudo-monarchy" almost overnight. The FCC should abide by the rule of thumb for doctors, lawyers and everyday people: Don't muddle up too many changes, too fast - whether in new medications, diets or other changes. (Even good medicine can produce disastrous results when the body is bombarded by too many changes all at once.)

Let the broadcasting conglomerates cope with their current traumas.

Considering the loyalties of conservative Republicans ... do not incapacitate the behemoth corporations simply to allow the wave of consolidation to continue. They are unable to change the trend on their own. Like members of an elite "gang" of oligarchs, the pressures to gobble up companies, market share and power will inevitably become their greatest vulnerability. They could never admit their fears of the "unintended side-effects" but the fears are real, and particularly invidious because they must remain unspoken.

Enron couldn't stop its addiction to their "revenue building techniques" any more than the Big Wall Street firms could stop their misleading "buy" recommendations until the shakeout by Eliot Spitzer.

Whenever there is such a threat to stability and health that cannot be acknowledged - for publicly all the big consolidators must support this rule change - fear becomes manifested in covert plotting for protection. One example of this manifestation is the "chatter about competition" we've been hearing in telecommunications - as if this distraction will somehow expunge the fact that the "playing field" is contaminated with fraud, deceit, subterfuge, and surreal pretenses for "leveling the playing field".

It is time to "get real" as they say. WAIT! No rule change until the SEC thoroughly reviews implications for their jurisdictional struggles, particularly regarding Sarbanes-Oxley. No rule change until the FCC is able to assess various future scenarios, not just polarized positions of political parties or diversity advocates. No change, until a method for insuring an open and fertile press and artistic expression is protected as sacred ... and that the method is VALIDATED for efficacy and not just rhetoric. Thank you.

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