



SUNSHINE PERIOD

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JUN 04 2003  
FCC - MAILROOM

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May 27, 2003

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Secretary  
Federal Communications Commission  
Office of the Secretary  
445 - 12<sup>th</sup> Street Southwest  
Room TW-204B  
Washington, DC 20554

Re: Informal Comments:

MB Dkt. Number : 02-277  
MM Dkt. Number : 01-235  
MM Dkt. Number : 01-317  
MM Dkt. Number : 00-244

Dear Ms. Secretary:

The Sisters of St. Francis of Penance and Christian Charity of Holy Name Province, located within the Diocese of Buffalo, New York, submit the following informal comments in the above-referenced *Notice of Proposed Rulemaking*, released September 23, 2002.

The Sisters of St. Francis have long been concerned about the erosion of local news and public affairs programming caused by the Federal Communication Commission's (FCC) and Congress' weakening of broadcast ownership limits as well as the FCC's elimination of broadcast rules. These rules formerly had permitted the FCC and the community to monitor broadcasters which helped to ensure broadcasters served their community of license with programs that met community needs and interests. In particular, in the Diocese of Buffalo, locally-produced and locally-directed religious programming, although wanted by the community, has all but disappeared, replaced by syndicated talk shows and infomercials.

The Sisters of St. Francis urge the FCC to refrain from making changes in the current rules which:

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- a. Prohibit cross-ownership of broadcast stations and newspapers in the same community;
- b. Limit the number of television and radio stations a single entity may own in a single community;
- c. Set a national ownership cap for television stations at an already overly-generous 35-percent of households; and
- d. Prohibit common ownership of major television networks.

Cable television already is dominated by the same companies that dominate television and satellite systems and the programming on those systems. Those same companies are moving into providing internet access. Neither cable or the internet (whether offered through cable or telephone companies) offer meaningful alternatives to the already-scarce supply of truly local news and local public affairs programs on over-the-air television and radio.

Respectfully submitted,



Mary McCarrick, OSF  
Provincial Minister

MM:cr