

My name is David Paulus and I'm the General Manager of WNOR, WAFX and WJOI in the Norfolk, Virginia area.

As I have spent the last 20 years in the local broadcasting business, and because of that passion for local broadcasting, I felt compelled to submit some brief comments regarding satellite radio companies like XM and Sirius attempt to provide local coverage of traffic and weather information within a marketplace.

Everyday of my professional life, I serve the Norfolk area by providing our listeners with the most current and up-to date LOCAL information possible. I live here, and breathe this local marketplace and I find it INSULTING that a company that was clearly licensed for a national broadcast is being allowed to produce and broadcast local weather and traffic. This is only the beginning. With a national organization that has no FCC regulations, and 120 channels each, they will reach into every local community and try to mimic what local broadcasters do.

Satellite radio companies CANNOT do my radio stations blood drives when supplies run low, they don't do my thanksgiving food drives when the local marketplace needs help, and I can assure you....when Hurricane Isabel blew through the Southeast Virginia area last September and my staff and I were sleeping on the floors and couches of my radio stations to help calm a panicked public for days upon end, XM and Sirius were NOWHERE to be found!

As a local broadcast operator and president elect of the Virginia Association of Broadcasters, I hope you take this issue seriously. I fully support the NAB's petition seeking a declaratory ruling of satellite radio's broadcasting of local weather and traffic. Before XM and Sirius invest millions of dollars and further raise consumer's expectations about their ability to receive specific content, the FCC must clarify it authorized these companies to be a NATIONAL-ONLY satellite radio service.

Local broadcasters have "stepped up" for years and years and committed 9.6 BILLION dollars in 2003 to it's local communities in public service time and fundraising. It's time for the FCC to step up and protect local broadcasters from this significant threat on our local product by allowing these companies to clearly violate the intention of this national satellite radio service.

Respectfully submitted,

David Paulus
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