

July 13, 2004

Federal Communication Commission
Marlene H. Dortch, Office of the Secretary
9300 E. Hampton Drive
Capitol Heights, MD 20743

RE: Rerention by Broadcasters of Program Recordings, Docket No. ~~04~~-232

Commission Secretary Marlene H. Dortch:

I own two radio stations in a small market; for me to record 90 days of programming will increase the losses I now have. To buy the equipment is extremely expensive and to perform the record keeping will be an intolerable expense.

I find it rather dubious to ask the industry to convict themselves instead of putting the burden of proof on the accusers.

The most violent programming you don't seem to object to. One of the most violent programs is the local evening news (5:30, 6:00, 10:00 and 11:00) where 60% of the program is spent in showing the viewers graphic pictures of fatal auto accidents, fatal house fires and graphic details of rapes, murders and robberies, even the sports segments highlight the fights that ensue during games.

Violence is more detrimental to the young mind than sexual innuendos.

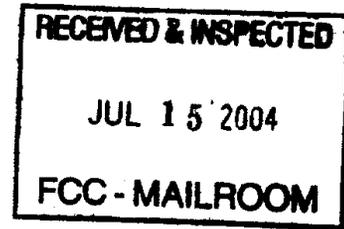
The crux of the problem is the cost is too expensive for those in small markets and, more importantly, it is unconstitutional to regulate free speech.

Regards.


Jerome Bresson

JB/jc

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RE: NOI, Broadcast Localism

Commission Secretary Marlene H. Dortch:

The proposals the FCC is making are basically the same and/or an expanded version of those thrown out in the early-to-mid 1980's.

You must differentiate between small, medium and large markets. Small-market radio stations must, by necessity, be locally oriented because it is good business and it differentiates them from out-of-market stations.

Any smart radio operator will effectively address the needs of his market, i.e. participating in fund-raising & parades, highlighting local sports events, promoting the needs of local fire and police departments, providing local weather and traffic reports, etcetera, etcetera. Market circumstances dictate the need to do this.

All non-affiliated stations produce their own local news – it's a necessity of life. Also, any non-affiliated station will broadcast all PSA provided (in most cases).

To sum it up, we are against this NOI. What confuses the issue in my mind is: how the same FCC that put out this NOI has tried desperately to allow the increase of ownership of broadcasters – both tv and radio – and then comes out with the NOI on broadcast localism – the two are diametrically opposed.

I would love to see justification of the two positions.

Regards,


Jerome Bresson

JB/jo