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Federal Communications Commission
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I was a volunteer engineer at Pacifica's flagship station, KPFA-FM in Berkeley when I was a 19 year old sophomore going to school at UC back in 1962-63. It was quite a rush being the only engineer there to run the whole 68K watt FM station from 5 p.m. to sign off Monday nights. Because I was interested in folk and bluegrass music, I'd often stop by the station on Friday nights to sit in the control-room with one of my fellow engineers there for the production of a program called 'The Midnight Special' which was an open-mic arena for local folk-music and blues musicians who dropped on by the studios .. it was always attended by a goodly crowd of listeners, and Berkeley street people, as well, and we usually had 25-40 people hanging around inside and outside of the studio where the music was being performed. I mention this to point out that I had an early introduction to 'localism' .. that new buzz-word/key-word which seems to have become such a touchstone recently in the debate over media-consolidation resulting from de-regulation of the broadcast industry.

As a local resident of Pacific Grove, I had the good fortune to arrive early enough on Monday to get a ticket to the hearing room for your recent 'localism' hearings in Monterey and attended your hearings there last night. An interesting performance, overall I thought. I have a few observations to make which would not have fit into the 2 minute public comment format, so I'm forwarding them herewith for your consideration, amusement and edification.

I don't know if you're familiar with the concept of *'a barking tree'* or not .. the idea is that of a situation/event which is created to draw the excited energy of a group and dissipate it harmlessly in 'sounding off ..' such as the image of a tree with a raccoon in the upper branches drawing a pack of dogs, who exhaust themselves barking furiously at its base. A diversionary tactic.

Now I really haven't been able to come to a conclusion as to whether the hearings last night were conceived and executed as 'a barking tree' or as a genuine effort to sound out the public sentiment on the issues of the consolidation of media which have resulted from Michael Powell's apparently ill-judged attempts to further loosen the limits on media ownership.

I suggest that only in the outcome of events yet unformed will we be able to make that judgment by what evolves out of the public sentiments expressed in the 5.5 hours that I was there, from beginning to end, in the middle of the 4th row at the Double-Tree Inn's Steinbeck room.

Certainly the proposed topic seemed like an effort to frame the issue in a limited sort of way, e.g. to constrain discussion to the question of 'localism' alone, without the larger issues which sit like the proverbial elephant in the room otherwise. Which is not a bad metaphor for the major sin of the major media, in the way they *frame* the news .. 'establishing by the implication of the framework, the 'limits of reasonable discussion/discourse' on any given topic .." I shouldn't have to point to Chompsky's 'Manufacturing Consent' as a footnote here, I'll take it as read.

The major media outlets in this country take a very narrow subset of the fuller range of discussion and present it to the domestic population as 'the limits of reasonable discussion' and isolate anything else, as 'beyond the pale.' The world at large is not fooled by this, but the domestic population knows nothing else and assumes that what they are told on the authority of 'it having been on Network Television' carries with it the authority of being 'the real deal.'

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When some critical juncture is reached such as the lead up to Bush's Iraqi War, that range of discussion *narrows* radically, down to almost no deviation at all on either side of a highly-militaristic super-patriotic hyperbole, just at the very time when the range of the discussion should be opening up wider, to admit a wider range of opinion to be heard, in order to circumvent just the very kind of disaster which has resulted from the Neo-Conservative's 'blind to all but their own opinion' approach to the issues of what such a war and its aftermath might entail, for the country as a whole and for the world, to say nothing of Iraq, the mid east itself, and the United States' position in the court of world opinion.

That, to me, is a more important aspect of media consolidation than the one of pure 'localism' which you posit as being the be-all and end-all of the discussion with respect to the outcome of the deregulation and pro-corporate mindset of the Bush administration and its majority of appointees on the Commission. The editorial limits placed on the range of the discussion and the framing of issues which results is toxic to a wider appreciation of full range of those very same issues. One is left with no alternative than to either go to the foreign press for a reasonably objective account of what is going on in the world, or else to rely on the few tiny pockets left which are not commercially driven by marketplace financial constraints and agendas.

My old 'alma mater' KPFA and Pacifica is the venue I seek out when it comes to getting the news and commentary which are simply filtered out of the commercial news portrayal of 'what is happening in the world.' Other noteworthy exceptions are KKUP (listener subscription radio) In Cupertino, and the news and political commentary of Travus T. Hipp, on KPIG-FM in Freedom, California, and sometimes the University of California's campus station KZSC-FM in Santa Cruz.

So you might say, 'Fine .. you have your niche in the electromagnetic spectrum, through Pacifica.' But the larger point is that, as was mentioned in the public comments, the rest of the public simply hasn't a clue about what is not being told them, by the major media, masquerading their news as 'the final word on WHAT IS (news).' Democracy requires the free flow of information in order to work, as otherwise the voting populace as no idea of what is actually going on. This is substantially the situation which prevails at present. Democracy is not being well served by the major news media, and the public trust is in the ash-can, in terms of the public owning the very airwaves which it is being propagandized over.

For example, let me just float one across your field of view here .. Michael Moore's *Fahrenheit 9/11* film provides an instructive lesson. Whatever one thinks about it, (I've not even seen it yet) we might posit that it's anti-Bush propaganda; whether it's the truth or not objectively is another issue. So why are such large numbers of people eager to go pay full theater prices to see it ? Because it's a novel viewpoint which has about it the aroma of undeniable reality. But 'mark the sequel': Why is it so difficult to visualize a similar movie being made by those partisan's eager to present Bush's side of the story ? Can you conceive of people paying today's high theater prices to go see a 2 hour movie presenting the Bush agenda ? Of course not. Why ?

Because *that movie* is already appearing free 24/7 on Fox News Channel.

And unless people stumble into the theater or hear friends talking about Fahrenheit 9/11, the version of reality which the public is going to assimilate (through the long learned lesson that what works in propaganda is endless repetition of a lie or premise you wish assimilated) is the Rupert Murdoch version of 'what is real.' If the people don't have any knowledge that anything else exists, they assume what they are being exposed to is 'all there is to know.'

To a lesser extent this is true of the 'agenda-setting major-media' *in toto*: the major networks are constrained by the editorial policies coming down from above in their own organizations, and that editorial policy is established by the corporate entity and those who run it at the highest

levels, and that is not a neutral bias in 21st Century America. The nominal objectivity of the press (or electronic media) has gone out the window long since along with nominal journalistic standards and any semblance of responsible investigative reporting. Where INDEED is the fairness doctrine now that we need it ?

--

O.K. but let's get back to your original premise: **Localism**. Let me tell you a little true story from the not too distant past.

In 1964 or 1965 I was working in Montclair California, and listening nights to KFMW-FM in San Bernardino, which at the time was running black programming in the evening hours .. it was the early days of Motown, 'that sweet soul sound' out of Detroit, and the two local DJ's were more agreeable to listen to than anything I've heard since .. it was a piece of local culture that existed out of time .. and was perfect and jewel-like, even down to the advertisements for 'Garrett's Barber Shop' and 'Sparkle-Car-Wash,' 'on Highland and Waterman ..' It was a community I had no knowledge of some, 35 miles away, but I became a part of it, white as I am, by proxy every evening, listening to that radio station's nearly magical programming. If I can find a tape of an air-check I made of it at the time, I'll enclose it on audio CD for you, because it carries with it it's own charm and authenticity which is totally a function of it so accurately and pleasingly evoking a certain time and place in a small ethnic culturally isolated pocket of society's larger fabric. It's in my humble estimation, a classic of musical and cultural Americana. And very good listening.

There were hints from time to time by the DJ's implying that they were under undisclosed threat of losing their toehold .. one could only hope as a listener that whatever these vague forces of economic reality were, probably representing the station owners, they would be held at bay .. and the magic continue night after night. Well one night the axe fell. No word of impending disaster from the Dj's in the last days leading up to the event. The whole format just suddenly changed to worthless and utterly banal elevator music. I felt crushed, but life goes on ..

Within the week following I drove up to Monterey from Southern California and returned ca. 4-5 days later. When I arrived back in Montclair, the very first image that hit me as I got out of my car and checked in with my neighbors, was them saying, 'Hey, come here and have a look at what's happening on T.V. ..'

And ***that*** was the original Watt's riots coverage on an old black and white portable TV set.

Causal effect ? No, surely not. KFMW was 60 miles away from Watts. I'm sure there was no causal direct linkage. But what it was: it was symptomatic of the times and the forces at play in the culture, both white and the black sub-culture. The local communal voice of that black subculture had been crushed out .. concurrently, the oppression of that same subculture 60 miles away in downtown Los Angeles, had finally ignited into an inferno.

So what am I saying here ?

Well that I am saying is THIS:

The black programming on KFMW in the mid 60's may have been economically marginal. But that station would not even exist in the current atmosphere of media consolidation, to have the choice to become the voice of a local ethnic minority community or not .. That programming on KFMW was their 'tribal drum' (in the words of Marshall McLuen), and I say this without any racial overtones because it had captured my heart to such an extent that my spirit and soul was dancing to and captivated utterly by that same drum.

What can we take away from this which might be implemented, in terms of policy changes ?

Well .. **Low and Micro Powered Radio.** Let's leave that whole ugliness aside for the moment with respect to what is happening on the level of the national media consolidation, and just look at the –REALLY- local picture.

It was my understanding that Michael Powell was instrumental in supporting a Micro-Power Radio initiative some months back, and that it got conked on the head by the Senate which was responding to lobbying by the Commercial Broadcasting Interests (NAB, etc.) in their interest in keeping micro-power or low-power radio marginalized to non-existent.

Open the floodgates. Not timidly but assertively.

Micro power radio or Low Power FM is probably more relevant to high density urban environments than to more suburban middle class communities such as the Monterey Peninsula, though I hear voices here and there which argue otherwise .. but it could provide the means by which local communities could create their own cultural 'tribal drums' in areas of cities which would in all ways do what localism in Radio is REALLY *supposed* to do: provide a core around which a community can find it's own identity: it's own image reflected back upon itself in a positive and life-affirming manner. That was what KFMW-FM did so uniquely in the mid 60's.

Compared to this the whining of local T.V. station managers about all their much vaunted gestures toward 'localism' rings empty and false. *Nice try,* but that's not what the public ownership of the air waves means in anyone's book other than those riding that particular gravy-train financially, for the 'momentary convenience of a passing manic fixation of the FCC.' Or well, if we cut them some slack .. their intentions may be good, but their execution falls tragically, hopelessly short .. It looks good within their own 'frame' but in a larger context *.. not even close.*

An entire renaissance of local radio might bloom into existence, if it were just permitted to do so.

It's possible that some intermediate level of ERP be considered for the larger communities involved. Something in between where KFMW failed financially and a micro power station which is limited to a few blocks which could serve its surrounding community better. I don't know .. I leave the details up to you .. but think about this. Don't take the crap the NAB gives you about interference seriously .. they just don't want the competition on what they've come to regard as their own turf, not realizing that it's really the public's turf and their presence there is only on public sufferance. Interference issues can be worked out. That's details.

If they rise up in arms, well how about what I'd like to see: Cancel –every- commercial station's license and have a complete reshuffle and re-deal with an eye to a more equitable redistribution of the public resources .. say 55% commercial stations (to serve those needs already established, such as they are) and 45% public stations .. of a genuinely non-commercial basis. See what they think about low power radio in THAT context. It might suddenly look a whole lot better.

NPR was originally designed to promote the public's lack of an outlet in a commercially dominated world, on the airwaves .. a pathetic gesture considering. But what has happened to NPR is that it's been subsumed by the government (via obsequious servitude to governmental (and now corporate) (ugh) grants)) and corporate agendas. It is now, essentially, the de facto voice of governmental policy, with just enough leavening of whimsy and non-threatening deviations from the official line to make it seem, nominally, like 'the Public's Radio Alternative.' But let's not kid ourselves .. I have airchecks I made in the first Gulf War of both NPR and Pacifica, and the only nominally objective reporting which took place was on Pacifica, while NPR was essentially cheer-leading for the war effort and on behalf of the Governmental policy de jour.

I'm reminded by NPR of the scenes in Solzhenitsyn's 'Cancer Ward' where the Soviet *aparachek* in the ward reads Pravda for clues as to changes in governmental policies in evolution .. I listen to NPR in the same sort of way: to glean where changes in gov't policy exist, reflected in the editorial bias of NPR indicate modifications of presently held governmental views and policies. The people's alternative network ? No, I don't think so. It's too smugly establishment.

NPR might be amenable to change, if it were financed off of money generated from 'renting of the airwaves' to the Commercial stations, and removed from the immediacy of servitude to the ruling elite. The BBC manages to maintain a better degree of independence from governmental influence. But it would take a major shakeup of the existing dominant institutional ethos and personnel to do it. It might be better just to start fresh. Pacifica does it: it *can* be done.

But alternative voices (not just a very limited acceptable subset) have to make it to the American People if democratic institutions are going to survive. And they are not currently .. so the challenge: to figure out a way that they can. A maximum of 1 FM, 1 AM and one TV station per company in any given venue, maybe ? Something has to be done if democracy's to survive.

That's why Michael Moore's film is such a phenomenon: it's because it's telling a unique truth that can't be heard anywhere *else* .. THAT's why people will pay to go see it: because THAT is something that people crave and know that they are not getting via the normal menu of crap being dished up by the media outcome of the FCC's 'regulation of the public's airwaves.'

The one other area I'd like to touch on is not directly connected to the FCC's perview, I believe, but is the issue of Internet Radio, which as you're aware does not move via RF but via IP packets. Internet Radio has a lot of potential to serve the diverse needs of the public .. it also has a lot of potential to be subsumed by Commercial Radio interests who are like jealous monks with respect to their new rival on the block, which they don't quite know what to make of yet.

If it is within your scope to do so, do what you can to keep governmental regulation out of Internet Radio altogether. Let it flower into what it wants to become. It's not dissimilar to what FM radio was like in the early 1950's, at present .. and I suggest that that is an excellent place for it to remain. The kiss of death of commercial exploitation of that medium is something that I can see the Commercial sector just aquiver over .. and if allowed its way, the death knell of IP based radio into mediocrity is only a few legislative bills by the Senate away, once the lobbyists get started on Congress members. If this is not already happening, it will be soon.

Well O.K. .. I've had my say. I'll get down off my soap box.

Now it's up to you. And I'm sure in the fullness of time we'll find out if the Monterey Hearings were just 'another barking-tree' exercise, to absorb the energy of public discord and hostility to FCC policies, or whether it represented a genuine interested assay of what those public views *are*. We'll either get more of the 'same-old-shit' or some major new initiatives to address the root needs of the public, such as are leading to the current discontent, which we certainly heard a good deal of in Monterey. I'm guessing that discontent is very widespread.

Respectfully,

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Thursday Juiy 22nd, 2004

PS:

Well I found the old cassette 'air-check' tape of KFMW-FM in San Bernardino from ca. 1965 or so, which is a poor quality audio dub from an old reel-to-reel tape made under adverse mono conditions and not improved by some print through, etc., etc. To me it's still very listenable as a document of an era and a piece of Americana, but the average individual, without the nostalgic associations that I have with that time and place might not find it as compelling as I do. I'd still be happy to transfer it to an audio CD and send it along if requested so to do, but I think that the gist of my comments are carried most effectively in the letter above, so I'll leave it at that for the time being and forward that while it's still relevant and timely. The cassette tape has a few problems and would take a little nursing along to get a good dub of to optical media.

The tape speaks eloquently, by its content, to the contention that 'localism' as propounded by the current vision of the FCC and the currently licensed broadcasters is a whole qualitatively different kind of thing from what I regard as 'localism,' i.e. the –voice- of a community, as opposed to the carrying of public service spots and presumptive locally oriented 'public service' programming.

In fact this tape of KFMW HAS a P-S-A on it for *job retraining*, which in light of subsequent actual developments seems quite a prescient message to the black community at the time, although it could obviously not foresee an era in which the problem would be more one of wholesale job exportation offshore, rather than just the need for retraining to meet a changing technology.

Anyway this letter's long enough. I'll desist. If you'd like a CD copy of the air-check I will be happy to go to the effort necessary to put it together for you. Otherwise, on the assumption that the whole localism assay by the FCC was merely a 'barking tree' to absorb public outrage at the consolidation of the broadcast media, I'll refrain from the effort involved in hauling this air-check to yet one more change of media from that of it's reel-to-reel origins back in 1965.

-Dave Bracher