

I am currently a voiceover artist and actor, but previously worked as an on-air radio personality, radio Music Director, Production Director and Assistant Program Director for a number of years.

As a radio personality, I saw consolidation take away a lot of jobs from local on-air deejays, and indeed I lost at least one job myself because of this, because my station deemed it was just easier to use canned and/or satellite-delivered preprogrammed announcers and music, than to train in local announcers and schedule them. Of course this also meant that our playlist was determined by somebody in Colorado who probably had never even been to the area, let alone knew anything about the local music scene or the local area.

In the best circumstances, the station where I worked would do numerous on-air interviews with local talent, would support them with live broadcasts and ticket giveaways at local venues, and would even give them airplay -- something that the artist likely would not get on the national charts. We certainly got more positive feedback from our listeners when we featured bands that they knew and had seen in person and whose career they had followed, than we did when focusing on an artist who was being pushed by a national label, but whose influence in the area was minimal.

As a current listener of radio, rather than an employee, I see the above type of station being edged out in favor of homogenized, non-topical, non-local, and bland programming. And I see this as one of the signs that radio is in a very sorry state -- one that I fear it may not recover from.

I worry about the power of the conglomerates like Clear Channel to lobby the FCC in this matter. Ideally, I would suggest the FCC create a panel, specially-chosen with representatives from both "small town" and "big city" stations. One way to keep the selection process of this panel more pure, might be to have all NAB-member radio stations submit a vote or a survey of who they would nominate for the panel.

This is a judgment call, potentially, and the definition should be determined by a panel, I believe. "Locally originated" and "locally produced" could still exclude "locally focused". I.e., something could be put together by a local station, but could have a non-local agenda. So those two labels have the potential of cutting out a focus on local music artists, for instance.

I believe that local news, public affairs, sporting events, and emphasis on local artists should all be considered to be "local programming". Not every station is able to do more than one type of programming, so I feel it's pointless and tyrannical to require an all-sports station, for instance, to also do public affairs programming... or an all-news station to feature local artists. However, I feel that there should be an attempt to cover all of those topics, among the various stations in an area. I realize this is hard to police, however, and this is a good topic of discussion for the previously-mentioned panel.

Participation by radio stations in local events is already recognized in so many other ways, I do not feel this should be counted towards a requirement of local programming, UNLESS said participation also includes significant devotion of air time to that cause.

I knew that the "modern" form of payola was going on at several of the radio

stations where I worked. The mildest form went something like this: A program director who added a song that was being pushed by a record company, would get a crate of cd's by artists of the PD's choosing for on-air giveaway, with the understanding by all that a portion of these cd's were going into the program director's personal collection. In more advanced forms, a PD would move certain songs up their personal charts much faster than national airplay or local requests would normally determine, and would be rewarded with all-expenses paid trips to see another artist on that label perform somewhere, or they'd get equipment or just highly preferential treatment, as long as they kept the record company contact happy.

Cash payments from indie promoters, from music researchers, and the like, should not be an acceptable practice.

Free concerts for a radio station by an artist should not be considered payola. Doing a concert for free should be one of the tools an artist can use to get themselves exposure, in order to make the idea of a concert more attractive to the radio station for them to promote it. No money is actually changing hands, and the person who benefits the most from this is the artist, by far.

Record labels of course should be able to buy spots advertising their artists, and include songs from that band. There's absolutely nothing wrong with that.

In all my years in radio, I never saw anything happening whereby a station received payment for front and back announcing. Of course I know the record company executives love it when stations do that ("if you play it, say it"), but I was always happy to accede to those wishes, because I personally received so much feedback from the listeners saying how glad they were that we said what the song was -- if they heard a song they liked, they wanted to know what it was called, who it was by, so that they could go out and buy it. People mentioned to me that there were a lot of stations that never said what songs they played, and they expressed to me that such practices bothered them. I can't see that anything which serves the public should be considered by the FCC to be in violation of sponsorship identification rules, simply because it also just *happens* to benefit the record companies along with the consumers.

In an ideal world, voice-tracking should be limited to a certain percentage of the broadcast day. But I realize that there are some stations that can no longer afford to remain on the air without supplementing (or replacing entirely) their local programming with voice-tracked broadcasts.

But it is very confusing to the listeners. It's like the wool is being pulled over their ears. Most of them honestly believe that the announcer they're listening to is in the same location that they are. But something still feels wrong, and I think they notice that ... they can't ever say anything local, such as obliquely referring to the weather, or the local sports team, or something stupid the mayor said yesterday, or how great this band was that they saw last night at a local club.

Stations that use voice-tracking extensively should be required to make up for that practice in other ways, in order to completely serve the local interest.

Yes, I understand it's become a question of dollars-and-cents, but if a

station cannot even afford to focus on their own community in any way, they simply should not be in the business.

I have dealt with the issue of "national" playlists extensively. At one station where I was Music Director for a time, we were using a playlist called "Niche", which was not created at all with our listeners in mind. The songs were all tested, they told us, but the tests were not done in our community, but somewhere in another state. How could they know what people in our community wanted to hear? Eventually I convinced our General Manager to allow me to supplement this playlist with a few carefully-chosen songs of our own, but it didn't help much. Finally after about a year or so, we dropped it entirely, and went back to locally-originated playlists, which our listeners noticed immediately. "You're not playing crap anymore," was the kind of response I kept getting after we switched back.

Low power FM sounds like a good idea, although I don't know a lot about it in actual practice. As long as it doesn't interfere with other existing signals, I don't see a reason why LPFM shouldn't be further explored and expanded.

Thank you for reading my comments. I feel this is a very important issue. And if we don't choose the proper directions for the future of radio, including the current tendency towards corporate multi-station ownership and management, to the exclusion of the individual and his community, the very lifeblood of radio itself could be at risk.

I would encourage the FCC to seek feedback from radio trade organizations including the NAB and the RAB, to talk to AFTRA (although I'm guessing the vast majority of radio jobs are still non-union), to take out advertisements and surveys in national trade magazines, and to always try to remember what is best for the common man, the local radio listener, whose view of the radio landscape is becoming more and more antiseptic, and less and less personal every day.

Thank you again for your attention and openness in gathering public opinions regarding this matter.