

As a longtime union member of both the American Federation of TV/Radio Artists (AFTRA) and the Communications Workers of America (CWA), I have a background of over 20 years in local radio and telecommunications. I am a freelance voice-over talent, a telecom engineer, and have been on-air talent at local educational FM stations and a news reader at Voice of America.

I also operate a personal website that pays homage to American musicians, singers, arrangers, conductors and songwriters. I maintain regular communication with both active and retired performers through my website and contributions to other web sites.

Many of the musicians whom I know have recorded for various Royalty Artists in Los Angeles, New York, Nashville and Branson. The music they create used to be played with great frequency on local stations (old WGAY, old WMAL) in the Washington/Baltimore market. However, since media consolidation, most of these local outlets have been sold or reprogrammed. The stations that replaced them are almost entirely programmed remotely from other cities using "voicetracking", satellite music formats, or syndicated talk formats.

The Commission needs to define "local programming" as that which is locally produced, locally programmed and features local or regional on-air talent. We also need a return to locally originated public service programs which are not simply delegated to the wee hours of Sunday morning when few listeners are tuned in. Saturday or Sunday mid-day or evening would be more suitable.

Local programming must first include a return to a station's commitment to regularly carrying locally produced newscasts. This does not mean that each outlet must have its own news department. A wire service "rip-and-read" local newscast should be the minimum standard. Other cost-effective options would be to air pre-packaged, locally-produced newscasts delivered by existing traffic reporting services. Although the ideal would be to have a newscaster at each station or local station group cluster, there are many ways to return local news to local stations. This is especially crucial during weather or civil emergencies, when a distant city out-of-town "voice-tracker" just won't do!!!

Station participation in local community activities, although admirable, is usually of a promotional nature only. Unless well executed, it is usually self-serving for the broadcaster. It seldom benefits the community at large.

In recent years, there seems to be a return to "Payola." Only nowadays it is done in a more creative way. One national radio chain owns a concert promotion business, outdoor billboard advertising and blurs the lines between what's legal and what's barely legal. These onerous practices need to be curtailed.

Voice-tracking is mainly used to shift on-air talent from high-paying, union jobs in major markets, to mediocre-pay non-union talent in rural and Southern markets. The same can be said of the recent trend toward station imaging and promo services. Those used to be done in-house. They are now contracted-out to non-union (so-called "financial core") freelance talent in smaller markets.

The use of National Playlists and common-denominator programming based on

focus group input has largely resulted in each major city having 8 to 10 stations with almost identical music formats. There is no originality in this type of offering. Especially left out are those listeners over 40 years of age. Virtually all regular full-time programming to this demographic has ceased (Easy Listening, Big Band, Popular Standards, etc.) despite the fact that these formats always made money and high ratings for broadcasters.

Although diversity is the desired goal, I personally feel that Low Power FM (LPFM) is not the way to achieve it. By its very nature, the signals are not dependable. Its usefulness is rather limited. The Commission would do better by reinstating local programming requirements on full-power commercial broadcasters, than to waste time of LPFM.

Perhaps the most stinging indictment that I can offer of the current state of local radio is this: Having lived in the Washington DC area since the late 1950's, I now find that I mostly listen to WETA-FM (NPR), WAMU-FM (NPR) and WTOP (Bonneville.) For music programming, I must rely on tapes, CD's or my own music formats. For well over 10 years, there has not been much else worth listening to on local DC radio. In closing, I thank you for your time and consideration in this matter.

Respectfully submitted,

/s/ Thomas-Kevin Bahler

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