

(1984) (“*TV Deregulation Order*”); *Radio Deregulation Order* at 994-98. The Commission acknowledges that it should avoid “regulations that straight-jacket all stations into the same mold.” *Radio Deregulation Order* at 998. Two decades ago, therefore, the Commission correctly eliminated its non-entertainment programming guidelines for commercial broadcast television and radio, requiring only that stations offer programming responsive to the issues of concern to the station’s listeners, as discerned by the station licensee. *TV Deregulation Order* at 1079; *Radio Deregulation Order* at 1013-14.

But the elimination of these regulations was not an indication that the Commission felt that broadcasters would cease the presentation of community-oriented programming in the public interest; to the contrary, the Commission believed that such programming would continue to be available in local communities. The Commission recognized in 1984 that “marketplace forces, not our guidelines, are the primary determinants of the levels of informational, local and overall non-entertainment programming provided on commercial television.” *TV Deregulation Order* at 1085. The Commission noted the “tremendous growth in the video marketplace” and noted that the average household received approximately 9.8 channels (including cable television) and that in the decade before the release of the *TV Deregulation Order* the number of commercial television stations increased 25% to 878. *TV Deregulation Order* at 1082, 1138. The Commission also noted “commercial television broadcasters must take into account the rapid growth in the cable television industry.” *TV Deregulation Order* at 1139. In 1984, the Commission estimated cable penetration at 39 to 40.5% of U.S. households, with 29 million homes subscribing. *TV Deregulation Order* at 1139-40. The Commission stated that the deregulation of television programming content “reflects the importance and viability of market incentives as a means of achieving [the Commission’s] regulatory objectives and will provide

television broadcasters with increased freedom and flexibility in meeting the continuously changing needs of their communities.” *TV Deregulation Order* at 1077.

Similarly, with regard to radio, the Commission noted that the radio industry had been “characterized from its beginning by rapid and dynamic change” and observed that the number of stations had grown from 583 stations in 1934 to nearly 9000 at the time of the Commission’s decision to do away with the programming processing guidelines for radio. *Radio Deregulation Order* at 969. This upsurge in the number of broadcast stations, the Commission concluded, required that “licensees specialize to attract an audience so that they may remain financially viable.” *Id.* The Commission judged that the marketplace would more effectively dictate the broadcast of content meeting the needs of a particular community than generic regulations prescribing such content. *Radio Deregulation Order* at 1013-14. The Commission’s conclusions with regard to both television and radio have been borne out over the past two decades and are at least as true today as they were then.

In eliminating its non-entertainment programming guidelines, the Commission was persuaded that “licensees will continue to supply informational, local and non-entertainment programming in response to existing as well as future marketplace incentives, thus obviating the need for the existing guidelines.” *TV Deregulation Order* at 1080. *See also Radio Deregulation Order* at 977. The goal of deregulation was to give television broadcasters the “flexibility to respond to the realities of the marketplace by allowing them to alter the mix of their programming consistent with market demand” and therefore the Commission judged continued television programming regulation to be “unnecessary and burdensome.” *TV Deregulation Order* at 1087-88.

The goal of radio programming deregulation was similar – to provide radio broadcasters with “the maximum flexibility to be responsive to issues important to their listeners, with the minimum amount of governmental interference.” *Radio Deregulation Order* at 978. The Commission observed that “regulation of necessity would be standardized nationwide, would be relatively inflexible, and would be likely to impose costs without compensating benefits.” *Radio Deregulation Order* at 1024. The Commission further noted that “to require programming aimed at unrevealed needs, which are difficult to determine, at the expense of programming that is clearly demanded by the public, is to replace the judgment of the government for that of the public.” *Radio Deregulation Order* at 1031. In the *Radio Deregulation Order*, the Commission outlined its expectation that broadcasters would “continue[] [the] provision of news programs in amounts to be determined by the discretion of the individual broadcaster guided by the tastes, needs, and interests of its listenership” and “responsive[ness] to the issues facing their community.” *Radio Deregulation Order* at 978. The Commission affords broadcasters the opportunity to address these issues by “virtually any means.” *Radio Deregulation Order* at 982. In making its determination, the Commission recognized that “more issues can be addressed through [] specialized programming than through a generalized ‘something for everyone’ requirement.” *Radio Deregulation Order* at 988-89.

II. Deregulation of Programming Content Fosters Localism

The *Notice* considers again introducing the straight-jacket of program content regulation. The Commission should not alter its deregulatory approach in this regard, however. The “tremendous growth” that has characterized television and the “rapid and dynamic change” characterizing radio in the past has only accelerated in the two decades since adoption of the *TV Deregulation Order* and the *Radio Deregulation Order*. In those two decades, nearly 500

commercial television stations have joined the 878 stations licensed in 1981, representing a 55% increase over the past 20 years, and more than 5000 radio stations have joined the nearly 9000 stations licensed in 1981. Audio Division, Federal Communications Commission, *Broadcast Station Totals* (as of June 30, 2004), available at www.fcc.gov/mb/audio/totlas/bt040630.html. Other traditional sources of news and information, such as weekly and alternative newspapers, have witnessed tremendous growth as well. Penetration rates for cable has increased significantly, and DBS has been introduced, offering hundreds of new channels, including both national and local news and discussion. 94.1 million households subscribed to one or more Multichannel Video Programming Distributors by the end of 2003, nearly 90% of television households. *Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming*, Tenth Annual Report para. 7 (2004). The broadcast networks share of television viewers has eroded steadily over the past decade, with cable for the first time garnering a greater share of viewers in the initial week of a new season. *Broadcasting and Cable, Cable's Clean Sweep*, p.10 (October 18, 2004).

Technological advances have also led to ever-increasing competition for the public's attention and have provided the public with access to diverse and antagonistic viewpoints in numbers unimaginable at the release of the *TV Deregulation Order*. In just the past decade, the Internet has become commonplace in American homes, schools, and workplaces. The introduction of satellite radio offers many additional news, information and public affairs programming selections to American consumers as well.

For all of these reasons, broadcast radio and television licensees find themselves in an ever-more competitive marketplace. As the Commission correctly recognized in 1981 and again in 1984, these competitive pressures create economic incentives for broadcasters to air

community-responsive programming. Consumers now more than ever have a plethora of sources for the news, information, and entertainment they seek. The competitive market pressures have and will continue to guide local broadcasters' appropriate community-responsive programming efforts much more effectively than any generic policies, practices, or rules imposed by the government far removed from local audiences.

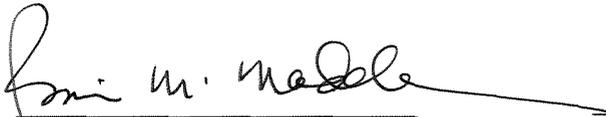
The market-driven sensitivities to issues of local concern envisioned by the Commission in the early 1980s are a reality, obviating any need for new government intervention. Moreover, as a long-time broadcast licensee, ST has its own well-established dedication to regularly scheduled community service programming, and supports and participates in numerous local and community events and causes. Attachment A documents just a sampling of the substantial commitment of ST's stations to community-responsive programming and activities. For example, WRCB-TV employs a full-time education anchor dedicated to reporting on local education issues whose coverage has garnered the station awards from educational groups for reporting excellence. WGCL(AM) took action to meet the needs of senior citizens in its community during the hot summer months by broadcasting radiothons and teaming with a local hardware store to provide hundreds of fans to local seniors. KTVN-TV interrupted regular programming and broadcast commercial-free during its nine-hour coverage of two wildfires threatening the station's viewers. WTTS(FM) features local and independent musicians in its concert series, compilation CDs, and programming.

CONCLUSION

As demonstrated by the foregoing material, the stations owned by ST are highly responsive to the needs and interests of their local communities. New regulatory intervention into program content is unnecessary and would only serve to stymie the efforts of broadcasters like ST to effectively serve their communities. For the foregoing reasons, ST urges that the Commission refrain from adopting policies, practices, or rules governing broadcast stations' program content, which regulations would, for the reasons correctly considered by the Commission in the past, in all likelihood reduce and not improve the dedication by the broadcasting industry of its substantial, creative programming efforts addressing the local needs and interests of the areas served by radio and television stations.

Respectfully submitted,

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COMMITMENT TO LOCALISM

NEWS AND COMMUNITY SERVICE PROGRAMMING

WRCB-TV produces 22 hours and 25 minutes per week of live, local newscasts. In addition, WRCB produces live, local newsbriefs that air during The Today Show. During Sarkes Tarzian's ownership of WRCB, the production of live, local newscasts has increased from eight hours and fifteen minutes per week to the current level. WRCB spends more than \$3 million per year to produce and promote local newscasts.

WRCB owns a Doppler Radar which is located in Chattanooga. It enhances this radar unit with state-of-the art weather computers and graphics systems, which allow WRCB to immediately notify the station's viewers of severe weather warnings.

WRCB produces a weekly half-hour public affairs program called TRENDZ ON 3. This pre-taped interview program addresses those topics identified on WRCB's "Community Needs and Interests" list. The station determines these issues by surveying area news viewers during its regularly scheduled news research projects. The survey data is supplemented by questionnaires which are filled out by TRENDZ ON 3 guests, published surveys conducted by other area organizations and by breaking local news events.

WRCB works with the Chattanooga PBS Affiliate, WTCI-TV, to air a weekly public affairs program. One on One airs interviews with local civic and community leaders. The program airs on both WTCI and WRCB. WRCB shares its "Community Needs and Interests" with WTCI. The programs address those issues.

WRCB airs a half-hour program called Connecting With Kids. The show features children addressing topics of importance to young people (e.g., bullying, self-esteem, diversity, sexual awareness, etc.). WRCB airs two half-hour programs each quarter.

WRCB also airs a series of news segments that deal with issues of importance to children and parents. These reports air three times per week in local newscasts between 6-7am. Since many reports are made available weekly, the reports deal with current topics. WRCB's education reporter/anchor chooses among the various reports to find the segments that have the most relevance for Chattanooga viewers.

WRCB airs a half-hour public affairs program that is produced by the Tennessee Department of Labor. The program deals with employment and workforce issues, which have been deemed important on WRCB's Community Needs and Interests list.

WRCB promotes, produces and airs a local Crimestoppers segment. These reports are shown during the 6pm and 11pm newscasts every Wednesday, the morning newscast every Thursday and the station's weekend newscasts. The segments focus on unsolved crimes and solicit the public for information.

During ST's ownership, WRCB has preempted network programming in order to air programming of greater interest to the local community. A partial list of such programming includes the Muscular Dystrophy Telethon, The Children's Miracle Network Telethon, The United Negro College Fund Telethon, severe storm coverage, an

address by the President of the United States which was not available through the network and Southeastern Conference Football.

During election periods, WRCB produces a “3 For The People” segment which airs during local newscasts. Instead of asking the candidates “the station’s questions”, WRCB asks viewers to call and tell the station the questions they want answered by the candidates. The station then attempts to get answers from the candidates.

WRCB’s regularly scheduled newscasts provide frequent coverage of local political issues. News stories are prepared by WRCB anchors and reporters and, when appropriate, candidates are interviewed. In addition to elections, WRCB’s news coverage extends to a multitude of local issues such as educational concerns (WRCB employs a full-time education reporter/anchor), public safety matters, crime prevention efforts, meetings of city and county governmental units, job creation efforts, local sports, local heroes, pet adoption services, health issues, veterans’ affairs, child abuse education, etc.

WRCB sponsors the local Jefferson Awards each year. The station solicits nominations of local unsung heroes. Five local winners are chosen. Vignettes are produced featuring these local winners. They air in WRCB’s regularly scheduled newscasts. The National Jefferson Awards organization chooses one of these local winners to represent the Chattanooga DMA at the National Jefferson Awards ceremonies in Washington, DC. WRCB and the national organization pay for the local winner’s (and a guest’s) airfare, hotel charges and banquet meals. The local winner gets to meet U.S. Senators and Representatives, a variety of dignitaries and other local winners from across the country. In addition, the local winner has a chance to be named as one of five recipients of a “National Jefferson Award” for local service. WRCB provides a certificate to each person who is nominated. Each of the five local winners receives a VHS copy of her/his vignette, a Jefferson Award’s Medal and Certificate and a U.S. Flag which has flown over the U.S. Capitol.

When the Tennessee Aquarium opened in downtown Chattanooga, WRCB originated all its morning newscasts from the site and preempted some regularly scheduled programming to air the opening ceremonies.

Every year, WRCB and two other television stations broadcast their morning newscasts live from the location of the “official kickoff” of the local United Way campaign. The content of this newscast is heavily weighted to interviews with representatives from the local United Way agencies and community leaders.

During the high school football season, WRCB produces a 20-minute “Friday Night Football” program which airs at 11:15pm. Highlights from as many as 20 local football games are shown. The station highlights the “Band of the Week”, “Cheerleaders of the Week”, etc. Local players and coaches are also interviewed.

WRCB has the Chattanooga area's only Reporter/Anchor dedicated to reporting on local education issues. These segments have earned several awards from educational groups for reporting excellence.

WRCB has been the recipient of the following awards: 2003 Regional Edward R. Morrow Awards for Small Market Television Newscast, Spot News Coverage, Continuing Coverage and Overall Excellence. 1996 NAB "Service to Children" Award. 1994 and 1997 Awards from the "Tennessee Disability Coalition" for news coverage. Certificate from CNN in 1996 recognizing WRCB's Outstanding Contribution to the Emmy-Award Winning Production of CNN's Coverage of the Olympic Park Bombing", 2003 Tennessee Associated Press Broadcasters Association Awards for Best Weathercast and Best Special Event Coverage.

KTVN produces 18.5 hours of local news per week, representing 11% of the station's total programming. KTVN also produces and airs a weekly half-hour public affairs studio interview program called "Face the State," which airs on Sunday morning adjacent to the CBS program "Face the Nation."

KTVN also airs a public affairs in-depth program called "On Assignment," which airs between 5pm and 11pm once per quarter, with additional replays across broader time periods. The station also airs a program targeted to children called "Kid Power," which airs on weekend mornings, twice per quarter, and which addresses the educational and informational needs of area children.

KTVN accepts produced PSAs from local organizations. It schedules them across all time periods. Over the past six months, KTVN ran 747 local PSAs, averaging 125 per month. Topics covered included: Highway safety when driving near trucks; Truckee Meadows Community College High School – where high school students can take college level courses for credit without tuition; Bring Your Meeting Home – a campaign to encourage citizens to recruit convention business to Reno; Education Collaborative – business school partnerships; Exercise and fitness for youth; Food Bank of Northern Nevada, United Blood Services – securing an adequate local blood supply, Reno Fire Department – fire safety; and, the Service Core of Retired Executives.

WGCL airs a weekday afternoon talk show that is almost totally devoted to local issues. The two-hour daily program features local newsmakers, community leaders, and anyone who dials in. It is a sounding board for community issues and a platform for promoting local events.

WGCL also airs a weekly program featuring in-depth conversations with representatives from local not-for-profit organizations.

WGCL employs two full-time and several part-time news people whose only focus is Bloomington and Monroe County. WGCL features local newscasts mornings, midday, and in the afternoons.

WGCL committed to localizing PSAs four years ago and at that time contacted not-for-profits in the community and invited them to come into the station's studios and record their own messages. The station typically has ten to fifteen organizations running announcements at any given time, and all announcements run throughout the broadcast day. The station has phased out nationally produced PSAs.

WTTS broadcasts a weekly one-hour program on a variety of topics of concern to its local audience. WTTS's Public Service Director produces the program. Content for the show comes from a variety of sources, including numerous electronic and regular mail suggestions from WTTS listeners.

In addition, WTTS airs a feature on Thursday mornings at 8 AM called *In Touch With Indy*. This feature highlights weekend events of interest to WTTS's area-wide audience.

WTTS broadcasts five newscasts per morning covering local, national, and international stories of interest to the station's audience. WTTS also uses its Web site to present issues of local importance.

WTTS relies on its listeners in creating and selecting programming on the station. The station communicates frequently with the nearly 15,000 listeners that have chosen to be part of the station's database. These listeners participate in online surveys and special "listener advisory panels" designed to improve and fine-tune the station's programming efforts.

WTTS airs locally produced programming during all but four of the hours it broadcasts each week.

WTTS airs both nationally and locally produced PSAs for charitable organizations, charitable events, and causes benefiting worthwhile public service enterprises.

When one of Fort Wayne's local military units returned home from Iraq, WAJI broadcast live from the homecoming parade route with one of its staff doing reports from one of the military buses.

WAJI and WLDE air seven local, live newscasts each weekday morning. Each week WAJI and WLDE both air two 30-minute programs, Sunday Side Up and Fort Wayne Feedback. These are both interview shows conducted with representatives from local politics, non-profit organizations, educational and recreational venues discussing matters of local concern.

WAJI and WLDE each run between fifteen and twenty-five PSAs per week.

In an effort to provide programming that meets the needs of WAJI and WLDE's community, the stations conduct a local research study each January consisting of 15-20 minute telephone interviews with 700 local people. Questions are asked regarding all elements of each stations' programming including the type of music, if there is too much

or not enough information in the form of weather and news, the type of entertainment preferred, whether there are too many commercials or not, etc. From this study, the stations strategize on how to give the local listeners what they want to hear on the stations. Twice a year, usually in February and August, the two stations do music tests for each station. During each test, 75 people are played snippets of songs following the format of each of the stations. Each song is rated as to how much the test subject likes the song, is familiar with it, or is tired of hearing it. From these tests, the stations determine the best songs to play for the local audience tastes in music.

COMMUNITY SERVICE ACTIVITIES

WRCB-TV purchased seven "Radar Net" units and gave them to local EMS (Emergency Management Services) departments in Chattanooga's five metro counties plus Bradley County, TN and Whitfield County, GA. These units allow local EMS personnel to access live, local Doppler Radar images (distributed via WRCB's VBI) and track storms on a county-by-county basis.

WRCB airs a weekly "Paul's Pet" segment which results in a puppy from the local Humane Society being "adopted" by a local viewer.

WRCB was approached by its local Congressman to develop a PSA campaign to support the Veterans History Project. Instead, the station partnered with a local hospital and financial institution and launched a 2½ year effort to professionally tape the stories of local veterans. WRCB provides cameras, lights, a set, advertisements, printed materials, etc. in support of this cause. The Librarian of Congress came to Chattanooga to officially kick-off the program. Each veteran receives a VHS copy of his/her professionally conducted (by an interviewer trained by oral historian) interview, a certificate of participation and various "thank you" items. The original tape is sent to the Library of Congress for permanent storage and eventual on-line access. WRCB airs one veteran's story each week during its afternoon, evening and morning newscast. The station has a speaker's bureau which has presented the program to hundreds of local organizations and civic groups, and has a Veteran's History Project float which allows local veterans to participate in local patriotic parades. A permanent display of the local Veterans History Project opened in May 2004 at the Chattanooga Regional History Museum. More than 500 interviews have been completed as of this date.

WRCB provides two scholarships per year to University of Tennessee at Chattanooga (UTC) students studying communications and two scholarships per year to UTC students studying business.

Twenty years ago, WRCB launched the Share Your Christmas Food Drive to benefit the Chattanooga Food Bank. WRCB purchases collection barrels which are placed in most major supermarkets from Thanksgiving through New Years. The station produces and airs promotional announcements and news stories about the Food Bank. On the second Wednesday of December, the station broadcasts live from the banks of the Tennessee River from 5am to 6:30pm. Viewers are encouraged to drive to the site and donate food or cash. The station's 5-7am and 5-6:30pm local newscasts originate at the remote site.

The station breaks in to regular programming twice each hour throughout the day to give updates on the project. In addition, the station preempts regular programming for a special one-hour show at Noon featuring performances by local artists, interviews with community leaders and stories about the Food Bank. Various community groups provide volunteers to help collect, sort and transport the food. WRCB pays all labor costs for WRCB personnel, generator and tent rental, power costs, uplink costs, etc. The station airs promotional announcements which begin after the event and air through New Years reminding viewers to visit the supermarkets and donate food in the collection barrels. Share Your Christmas is the largest broadcast food drive in Chattanooga. It routinely results in the collection of more than 100,000 pounds of food.

WRCB welcomes “Wine Over Water” each year by producing and airing PSAs. This event raises funds for the non-profit organization Cornerstones. This group works to preserve historically significant architecture in Chattanooga.

WRCB and its personnel contribute cash and countless hours of volunteer time to community organizations. Listed below is a partial list of such contributions during the past year:

- WRCB produces and airs PSAs and produces a 7-minute video which airs during the annual Siskin Star Night. A WRCB anchor also serves as Master of Ceremonies for this event which raises funds for the Siskin Children’s Institute (SCI). SCI serves the needs of local children who suffer from disabilities. The 2004 event netted \$216,000 for the programs and services of SCI.
- WRCB co-sponsors a luncheon during the annual “Symposium on the 19th Century Press, the Civil War and Free Expression”. This event is a refereed, academic conference which each year features some twenty papers presented by scholars from across the country to an audience of community members, university faculty and high school and college students. The Symposium is organized by Dr. David Sachsman from the University of Tennessee’s Department of Communication.
- WRCB produces and airs PSA’s for the “Kids First Coupon Book” campaign. WRCB anchors and its “Snowbird” mascot participate in “kick-off campaigns” at area schools and at the closing ceremonies. Local businesses place coupons in a booklet which students sell for \$10 each. The net funds raised remain with the individual schools to supplement funding from regular sources.
- WRCB anchors, managers and other employees gave talks or participated in events at the following locations in 2003 (this is a partial list): Kiwanis Club of Cleveland, TN...The Dare graduates at Dupont Elementary School...Clifton Hills Elementary School...Chattanooga Valley Baptist Church Seniors’ Group... 21st Century Academy Beta Club...Lady Mocs

Appreciation Banquet at UTC... Brookwood Elementary School in Dalton, GA... Christian Heritage School in Dalton, GA... DARE graduation at Bess T. Shepherd Elementary... Market Basket Banquet and fundraiser for Family and Children's Services... Brown Academy's "African American Read-In" during Black History Month... Red Bank Middle School... Judging for the "Science Olympiad" for area middle school students... Blyth-Bowen School in Cleveland, TN... Special Chattanooga Symphony and Opera series to celebrate American Heroes. WRCB anchors recited excerpts from Dr. Martin Luther King's "I Have A Dream" speech to the accompaniment of Beethoven's 9th Symphony... Memorial Baptist Church's Seniors group... Big Ridge Elementary School... East Side Elementary School... Richard Hardy Memorial School in South Pittsburg, TN... Soddy Elementary School... Brainerd Baptist Pre-School... Alexian Village Retirement Center... A WRCB anchor served as hostess for the Ebony Fashion Fair to raise funds for local charities... Hamilton County Pachyderm Club... Iwo Jima Survivors Annual Luncheon arranged by the local Marine Corps League... Normal Park Elementary Magnet School... A WRCB anchor was emcee for the American Heart Association's "Hearts On Track" Gala... Brown Middle School... Judging for the "Senior Project" at Chattanooga's School for the Arts and Sciences... Military Officers Association of America... East Lake Academy... Fellowship of Christian Athlete's "Road to Victory" Banquet... Chattanooga Area Traffic Club... Greater Chattanooga Sports Hall of Fame Banquet... Battlefield Primary School's "Read Across America" program... Canterbury Place Retirement Home... Ringgold, GA Primary School... Orchard Knob Elementary School... Westview Elementary School... Hopewell Elementary in Cleveland, TN... Catoosa County, GA Chamber of Commerce... Hixson Elementary... "Pizza With The Pros" program at UTC's Communication Department... Cleveland, TN Media Association... Falling Water Elementary School... Central High School... A WRCB anchor hosted "Annual Showcase of Talent" which awarded scholarships to area high school students... "Meet The Firms" event at Southern Adventist University... Emcee for "Pound Of Gold" dinner to benefit the Boehm Birth Defects Center... Auctioneer for "Charity Jam" to benefit the Fraternal Order of Eagles... Soddy Daisy High School Career Fair... Sponsored a table and provided an emcee for the Juvenile Diabetes Foundation luncheon... Teachers Supply Depot at Garber School (WRCB made a cash donation and provided an emcee)... Emcee for "ArtsFest for Hamilton County Schools" event... Chattanooga Valley Elementary... Science Fair judge at Ooltewah Elementary... Hamilton County Superintendent's Student Honors Banquet... Emcee for the Gordon Lee Follies to raise funds for the Gordon Lee High School marching band in Chickamauga, GA... WRCB sponsored a team for the annual "March of Dimes Shootout" golf tournament... WRCB sponsored a team for the Annual Big Brothers/Big Sisters golf tournament... WRCB sponsored a team for the annual Better Business Bureau golf tournament... Chattanooga Christian School Career Fair... Boyd Buchanan School's Career Fair... Ringgold, GA

Elementary...WRCB anchor performed with local students in the Center for Creative Arts production of Joseph and the Amazing Technicolor Dream Coat...Judge for "Green Power" poster contest at Orchard Knob Middle School as part of Earth Day event...Kiwanis Club of East Ridge, TN...AARP in Ft. Oglethorpe, GA...Judge for a science fair at McBrien Elementary...Emcee for "Helene DiStefano Fund Luncheon" to raise money to fight breast cancer... North Lee Elementary in Cleveland, TN...Taught weather merit badge class for a Boy Scouts Merit Badge Workshop in Dade County, GA...Emcee for "25th Anniversary Celebration of the Carats Ball" to benefit local charities...Served as "game show hosts" and provided PSA's and a team of walkers for the annual "March of Dimes WalkAmerica"...Wills Valley Elementary in Fort Payne, AL...Emcee for the annual "Women In Real Estate" talent show... Auctioneer for fundraiser at Normal Park School...Emcee for the National Cornbread Cook-Off during the Cornbread Festival...Provided a float for WRCB anchors and area veterans in Chattanooga's Armed Forces Day Parade...Produced and aired PSA's and provided a tent at the 4 Bridges Arts Festival...Meigs County, TN South School...Emcee for the Chattanooga Society of Case Workers Conference...Career Day at Howard Elementary School...Girl Power Conference at Eastside Elementary...DARE graduation at 21st Century Academy...Howard Elementary...Hamilton County Local Emergency Planning Committee...Emcee for the "25th Anniversary Celebration" at the Montessori World of Children...Chattanooga Civitan Club...Helped prepare a video for Bayside Baptist Church's Youth Theater...Sponsored a team in the "Grown up Spelling Bee" to benefit "READ of Chattanooga"...Northwestern Technical College in Rock Springs, GA...DARE graduation at Black Fox Elementary in Bradley County, TN...Emcee for awards banquet at Red Bank High School... DARE graduation at E.L. Ross in Cleveland, TN and Spaulding Elementary... Battlefield Elementary...Emcee for Little Miss Mag Daycare graduation ceremonies...participated in the Choo Choo Challenge Bicycle Ride to raise money for Memorial Hospital's Cancer Resource Center...Burning Bush Baptist Church's Senior's Group...Fashion Show for the National Council of Black Women...Emcee for the annual Riverbend Run to raise funds for local charities...Emcee for "Count On Me" campaign luncheon to bring together several health organizations for a county-wide effort to reduce cardiovascular disease...donate to and air PSA's for Blood Assurance of Greater Chattanooga...Summer science and math camp at Phillips Temple Church...City Park School in Dalton, GA...Brainerd Hills Baptist Church's Seniors group...Summer program of Girls, Inc....Chattanooga Kiwanis Club...Jewish Community Center...Crimestoppers Ex-officio Board of Directors...Hamilton County School's Vocational Education Advisory Panel... Rotary Club of Downtown Chattanooga...Better Business Bureau Board of Directors...Chattanooga Area Food Bank Board of Directors...UTC's Communication Department Advisory Panel...Hunter Museum of Art Marketing Advisory Committee...Pleasant Grove Baptist Church in Cleveland, TN... Hamilton

Place Rotary Club...Cleveland Kiwanis Club...Hixson High School's Service Learning Class...Alumni Association of Bledsoe High School...Produced and aired PSA's and hosted a table at the local CultureFest celebration...Fairylnd Elementary...Dayton, TN City School...co-chairs for the "Room In The Inn Rummage Sale" to raise funds for people removing themselves from abusive relationships...Allen Elementary...Apison Elementary ...Moderator of a Hamilton County Public Library panel discussion on free speech...participated in and provided an Emcee for the "Trail of Tears" motorcycle ride to raise funds to create and maintain memorials on the route of the Trail of Tears...Red Bank Chamber of Commerce...Ooltewah/ Collegedale Kiwanis Club...Chattanooga Area veterans Association...Harrison Elementary...WRCB produces and airs PSA's, hosts an on-site tent and fields a team in the annual Komen Race For The Cure to fight breast cancer...A WRCB anchor was named "Citizen Of The Year" by the Chattanooga Civitan Club...White Oak Elementary...Spring Creek Elementary...The Bright School...Dawnville Elementary in Dalton, GA...Silverdale Baptist Academy... Emcee for the Annual Cleveland/Bradley County United Way kickoff luncheon... Participated in Erlanger Hospital's Family Health Fair...Emcee for the Annual Chattanooga Women's Christian Luncheon Auction...WRCB is a member of and purchases a table at the annual meeting for the Chattanooga African American Chamber of Commerce...Cash donation to Cleveland/Bradley County's Chamber of Commerce industrial recruitment campaign...Cash donation to the Greater Chattanooga Area's Chamber of Commerce industrial recruitment campaign...Emcee for the "Alive To Drive" event for the local non-profit organization, MAKUS. This organization attempts to reduce teen traffic deaths through education in the importance of using a seat belt and increasing the number of driver education courses...Career Days at Chattanooga Christian School, Cohutta Elementary School and E.L. Ross Elementary in Cleveland...Emcee for the "Buddy Walk" to benefit people with Downs Syndrome...Speakers for Communication classes at UTC and Chattanooga State Technical College...Emcee for the Children's Advocacy Center's 3rd annual "Where Pop Meets Country" event...Kindercare Learning Center...WRCB produced a 10-minute video, hosted a table and provided an emcee for the "Possibilities" luncheon to benefit Siskin Rehabilitation Hospital ...Emcee for Chattanooga Food Bank's "Can-Struction" program...WRCB sponsored a table at the National Philanthropy Luncheon...Michigan Avenue School in Cleveland, TN...Harrison SDA Church...DARE graduation at Brown Academy...East Chattanooga branch of Senior Neighbors...WRCB is a lifetime member of the local chapter of the NAACP. The station also sponsors a table and sometimes provides an emcee for the Chapter's largest fundraiser, the Ruby Hurley dinner...WRCB airs commercials and PSA's and purchases a table at the annual "Night To Remember" banquet and concert. This event raises funds for area non-profit organizations which provide services primarily to African-American citizens...St. Jude's School as part of a "Young Readers Day"

program...Athens, TN Kiwanis Club...Lakeside Academy...Griffith Elementary School in Dunlap, TN...Ringgold, GA Middle School's Career Day...Pet Placement Center...Career Day at Signal Mountain Middle School...North Hamilton County Elementary...A WRCB anchor performed "The Christmas Story" with the Chattanooga Symphony and Opera...Emcee for the annual Foster Grandparents' Banquet...Emcees for the Chattanooga Downtown Partnership "Grand Illumination and Lighted Boat Parade"...Signal Mountain Presbyterian Church...Boynton Elementary...WRCB employees form the "Channel 3 Christmas Choir" and perform at area nursing homes and retirement centers...WRCB provides a float and anchors to participate in 20 or more holiday parades in the station's viewing area. The station's Snowbird mascot also rides on the float...Participant in a "Suddenly On Saturday" career and motivational event at Brainerd High School...Emcee for the Chattanooga Downtown Christmas Parade...Highland Park Baptist Church...Nolan Elementary...Emcee for the "Appalachian Christmas" event in Downtown Chattanooga...Varnell Elementary...Presentations to the "Career and College Conversations" program at East Ridge High School...Scenic Land School...Emcee for the "Chattanooga Christmas Festival"...Senter School... Oakwood Christian Academy in Chickamauga, GA...Wrapped presents as part of a fundraiser for the local non-profit organization "Kids On The Block". This program uses puppets to teach life lessons to area students.

WRCB produces PSAs and a 15-minute video and provides a Master of Ceremonies for the American Lung Association of Tennessee's (ALAT) annual "Women of Distinction" luncheon. This is ALAT's largest annual fundraiser.

WRCB produces PSAs and a 7-minute video and provides a Master of Ceremonies for the annual Pat Boone/Bethel Bible Village Golf Tournament and Celebrity Auction. This event is the largest annual fundraiser for a non-profit organization which provides housing, education and a nurturing environment for troubled children or children whose parents are incarcerated.

WRCB and the local newspaper co-sponsor an annual "Best of Preps" event. Outstanding local high school student athletes are recognized on-air, in the newspaper and at an annual banquet. WRCB provides the video production for the banquet and a Master of Ceremonies. WRCB also pays half the cash costs of this event.

A WRCB "School Patrol" story convinced First Tennessee Bank to contribute \$6,000 to Soddy Elementary to re-stock their computer lab which had been reduced from 20 to 1 PC's. A total of \$20,000 was raised as a result of the story.

A WRCB "School Patrol" story convinced the Fraternal Order of Police to donate \$1,000 to Red Bank Elementary. The money was needed to buy clothing for the children of homeless families attending the school.

In recognition of its contribution to the community, WRCB was honored as the "Corporate Philanthropist Of The Year" during the 2000 National Philanthropy Day celebration.

KTVN-TV created the Time 2 Act program, which brought the school district, phone company, secret crime tip line and KTVN together to create an anonymous tip line for students to report potentially violent students before violence erupted.

KTVN donated video support and produced and aired programming dramatizing the impact of a drunk driving fatal accident involving high school students for Every 15 Minutes.

WGCL makes special efforts to identify needs in its community and works to meet those needs. For example, when senior citizens were having difficulties during the hot summer months, WGCL established the WGCL Fan Club. Working with the Area 10 Agency on Aging and a local hardware store, the station broadcast afternoon radiothons over the past four years in which listeners bought hundreds of fans for local seniors.

WGCL has also used radiothons to get phone cards to military personnel serving overseas.

WGCL set up a campaign to raise funds for a local disabled man who needed a new motorized cart to get around town.

In addition, WGCL has directly participated in the Salvation Army's holiday bell-ringing efforts, helped raise funds for the local food bank, and had remote broadcasts in support of Red Cross blood drives.

WTTS designs many promotions and programming features to benefit charitable organizations, both national and local. For example:

- The annual *WTTS Collectors Edition CD* contributes all net proceeds to central and south-central Indiana charities. This year marked the 9th Edition of the CD. In the past few years, organizations such as the Indianapolis Public Schools, Jill's House, Middleway House, and Kids Business Expo have all benefited from sales of the *WTTS Collectors Edition CD*.
- WTTS also holds Private Listener Concerts to benefit local charities. For example, the recent WTTS Bodeans Benefit featured the national band Bodeans playing a show for all WTTS listeners who made a cash donation to the St. Jude Children's Research Hospital.
- WTTS secured exclusive autographed music items for a silent auction which proceeds also benefit St. Jude Children's Research Hospital

- In 2003 WTTS developed a charity designed to help local school music programs in the face of budget cuts. Through a series of charitable concerts and promotions, WTTS collected and refurbished used instruments and collected thousands of dollars for underprivileged students in central Indiana. The program, called WTTS Band Together. The program has been awarded several prominent commendations for charitable work and has been recognized by many media outlets for its contributions to local school music programs, including winning a 2003 Silver Award from the International Festival and Events Association for “Best Community Outreach Program.”
- WTTS annually holds free holiday shows to benefit Toys for Tots in Bloomington and Indianapolis.
- In August 2003, WTTS heavily promoted the local efforts of the Red Cross to benefit victims of devastating floods in the region.
- In 2003 and 2004, WTTS had two shows called “Blues on the Ave” featuring John Hiatt and Delbert McClinton to raise tens of thousands of dollars for the Ruth Lilly Hospice.
- WTTS executed a large concert with a national recording artist to raise awareness and funds for the local Eiteljorg Indian Market.
- WTTS heavily promoted a golf outing raising thousands of dollars for St. Jude Children’s Hospital
- WTTS had a 2003 event called Bowling for Rhinos to raise awareness and funds for the Indianapolis Zoo rhino exhibit
- WTTS promoted the 2004 Heartland Film Festival, raising awareness for the arts in the community.
- In the past eighteen months, WTTS has held on-air auctions of high-demand tickets to raise thousands for Riley Children’s Hospital.
- WTTS raised awareness for local filmmakers at the Indianapolis Film Festival
- WTTS heavily promoted the local Dino Trail Run and Mountain Bike Series in 2003 and 2004.
- WTTS was the sole radio sponsor of the inaugural Indy MP3 CD Project, which was commissioned by the City of Indianapolis. The CD featured over 100 tracks from local, unsigned artists and received national press attention.
- WTTS was the sole radio sponsor of the Nathan’s Battle Golf Outing, which raised thousands of dollars for Nathan’s Battle Foundation to find a cure for Batten’s Disease.

- WTTS has been the sole media sponsor for America Remembers September 11 tributes. The event raised \$17,000 in 2003 and more than \$20,000 in 2004 for the Indianapolis Firefighters Bereavement Fund.
- WTTS programs and promotions have also benefited local and national breast cancer research, AIDS research, the local Humane Society, Indianapolis' Riley Children's Hospital, the Ruth Lily Hospice, Toys for Tots, Earth Day Indiana, Easter Seals, Broad Ripple Art Fair and many other fine organizations.

The following are examples of the major events WAJI is involved with:

- **FAME** (Festival for Arts and Music in Education - March): Media co-sponsor, promote and do MC duties at the event.
- **TAPESTRY** (Apr): Media co-sponsor, promote this event which is put on by IPFW and Parkview Hospital as an educational day for women with many events. All proceeds go to the IPFW scholarship program.
- **BUSINESS EXPO**: (May): Media co-sponsor of this event, run by the Fort Wayne Chamber of Commerce. WAJI also staffs a booth at the event.
- **VERA BRADLEY SALE/TENNIS AND GOLF TOURNAMENT** (May/June): Media co-sponsor, promote the event, and provide the celebrity MCs. Proceeds all go to breast cancer research.
- **KID DID** (June): Media co-sponsor this downtown event that is free of charge, provides children's activities and promotes the downtown area of Fort Wayne.
- **THREE RIVERS FESTIVAL** (July): The station sponsors and puts on several events within this huge community event, all free to the public giving them also a chance to win money and prizes.
- **TOOLS FOR SCHOOL**: The station co-sponsors this drive facilitated by the Salvation Army to collect school supplies for low-income families.
- **RILEY RADIOTHON** (Aug): Three-day telethon to raise funds for Riley Children's Hospital. The station works in conjunction with Children's Miracle Network for this event and conducts the radiothon from center court at a local shopping mall.
- **HALLOWEEN AT SCIENCE CENTRAL** (Oct): Media co-sponsor and host of an afternoon event at Science Central as a safe venue for children.
- **HOLIDAY FEST** (Nov/Dec): WAJI is a media co-sponsor for this event which encompasses the City Christmas lighting ceremonies and various other City event functions during the Holiday Fest.
- **CHRISTMAS WISH**: WAJI works with the United Way in collecting and filling requests for help in the true spirit of the holidays. This could be anything from getting somebody a trip to see a dying relative to providing a holiday meal and many things in between.
- WAJI's morning show routinely does features involving community issues such as giving away 9 volt batteries during Fire Prevention Month, having a morning show person work along with a State Trooper to illustrate the effects of alcohol, having a host get a flu shot on air to encourage people to do so, and giving blood on air to encourage the donation of blood.

- **WEB PAGE:** The station's web page links to "Homework Helpline" through Rose-Hulman and also link to other non-profit event sponsors. The station updates the page weekly with local community events.

The following are examples of the major events WLDE is involved with:

- **TAX DAY (April):** WLDE gives out lunch to those last minute tax filers at the main post office branch.
- **BUSINESS EXPO: (May):** WLDE is a media co-sponsor of this event run by the Fort Wayne Chamber of Commerce. The station also staffs a booth at the event.
- **FROM SOLE TO SOLE: (May)** Working in conjunction with the school systems in the station's area, the station provides the schools collection boxes and encourages school children to donate their slightly used gym shoes that they can't wear the next year so that underprivileged children can have some the next year.
- **FOURTH OF JULY PARTY AT IPFW (July):** WLDE hosts this evening with the Weenie Wagon giving away free hot dogs, chips and drinks to fireworks viewers who watch from the lawn at IPFW.
- **THREE RIVERS FESTIVAL (July):** At Fort Wayne's annual festival, the station puts on many events over the nine days including a parade block party for the station's listeners, the Lutheran Home Ice Cream Social, the Family Fun Night Concert, all free to the public.
- **MDA (September):** The station holds a Rock and Roll silent auction on Labor Day to benefit the Muscular Dystrophy Association.
- **STUFF-A-BUS RADIOTHON (Nov):** The station broadcasts Monday through Wednesday from a large bus set up at a local food store soliciting non-perishable food items for the Associated Churches Food Bank.
- **ROCK & ROLL UP YOUR SLEEVES:** Whenever asked by the local American Red Cross, which is a couple times a year when blood supplies are low, the station broadcasts from the Red Cross to encourage donations.
- In addition, WLDE promotes and hosts or provides MCs for many local concerts, shows, sporting events and smaller fund raisers.

EMERGENCY PROGRAMMING

During several severe weather events, WRCB-TV has preempted all programming to provide local news coverage. In these instances, the station often opens its telephone lines to provide direct access to the station's viewers.

WRCB maintains generators at its studio and transmitter which allow it to continue to serve its viewers during power outages.

Whenever a local emergency exists, WRCB presents emergency information through crawls, on-screen icons, program interruptions and program preemptions. During Sarkes Tarzian's ownership of WRCB, emergency programming has been produced for severe winter ice and snow storms, local flooding, local tornadoes, local murders, multiple fog-related auto accidents on area interstates, school bus/train collisions resulting in local deaths, emergency local school board meetings, visits to Chattanooga by Presidential candidates, etc.

Over the summer, KTVN interrupted its regularly scheduled programming at least three times for combined coverage of at least nine hours in the late afternoon to provide sustaining emergency information to viewers threatened by the Waterfall Fire and the Andrew Fire. The station dropped commercials from its coverage in order to get the latest information to viewers as quickly as possible. The Waterfall Fire raged for two days, burning 15 houses and threatening the State Capital and Carson City. The station's switchboard was extremely busy during its coverage, gathering offers of help from viewers, answering questions and gathering information to supplement the station's coverage. KTVN's extensive live capabilities were utilized in the coverage. KTVN has a live satellite truck and two live vans, each of which were used in this coverage. The live remote portion of this coverage would not have been possible without being able to use the spectrum allocated for ENG coverage. KTVN also used its computer weather system to illustrate the threatened areas, where the fire was going and local wind conditions critical to fighting the fire. KTVN lost revenues of over \$10,000 in order to provide sustaining coverage of these fires.

In 1997, KTVN broadcast several days of live coverage of the New Year's Flood, which was a 100-year flood that hit a major portion of the station's viewing area. KTVN was awarded the local Sir Award from the Associated General Contractors for its coverage and was praised by local law enforcement for reducing the public threat by giving citizens a way to keep up on the flood without going to the hardest hit areas to look for themselves and place themselves and law enforcement personnel in danger.

WGCL has interrupted programming for local tornado warnings to advise listeners of emergency precautions. The station also broadcasts live reports from local emergency officials. The station also interrupts programming for significant community events, such as the State of the City address and the announcement of a new president at Indiana University. WGCL is always willing and able to help out with disaster relief efforts when they are needed, as it did following a tornado in nearby Ellettsville three years ago.

WTTS interrupts regular programming whenever an important news or weather situation warranting immediate announcement arises. WTTS broadcasts frequent information regarding severe weather that threatens any portion of the station's listening audience. WTTS has also recently broken into regularly scheduled programming to bring its listeners information on the war in Iraq, the stroke and subsequent passing of Indiana

Governor Frank O'Bannon, the capture of Saddam Hussein, the passing of former President Reagan, and a number of other events of interest to the station's audience.

WAMI and WLDE interrupt regular programming for severe weather problems, traffic problems, news events and Amber alerts. On a national level, both stations immediately air any CNN bulletins and also have the option to air a CNN feed if the situation warrants the need for national news.

WAMI and WLDE's EAS equipment has the latest Amber Software and relays Amber Alerts instantly, and automatically. The alerts can be originated from the Indiana State Police or Allen County Emergency Management for local missing or abducted children. The stations are notified via fax, email, and/or EAS of the Amber Emergency. An alert aired on WLDE actually resulted in the return of one abducted little girl. The suspect's car passed a truck driver right after he heard the alert on WLDE and he called it in, following the car, which resulted in the abductor's capture and the little girl's return.

WAMI and WLDE's EAS equipment has filters set to air National Emergencies, Tornado Warnings, and Amber Alerts instantly and automatically. The stations have an "Emergency Plan of Action" for station personnel. All are subject to being called in if a situation becomes threatening to the stations' local area. An example is the big Christmas Eve snowfall two years ago that created hazardous travels. The stations interrupted their programming to give traffic and road condition updates from city, county and state police as well as reports from the local airport about delays.

WAMI and WLDE have a computerized school closing program and broadcast school delays and school closings every fifteen minutes on mornings with inclement weather. The information is also immediately posted on the stations' web pages.

LOCAL MUSIC INITIATIVES

WTTS Private Concerts regularly feature local, independent artists.

WTTS Band Together concerts have featured local and independent artists a majority of the time.

WTTS has featured local artists on the biannual WTTS New Music Sampler projects and the WTTS Collectors Edition.

On Sunday nights, WTTS airs The City of Music Hour, an hour-long program dedicated to independent and local music. WTTS regularly interviews and promotes local musicians and concerts on daily programming features such as Things to Do, Places to Go.

WTTS promoted an annual three-day event promoting local and unsigned artists.

WTTS was the sole radio sponsor of the inaugural Indy MP3 CD Project, which was commissioned by the City of Indianapolis. The CD featured over 100 tracks from local, unsigned artists and received national press attention.