

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Children's Television Obligations)
Of Digital Television Broadcasters) MM Docket No. 00-167
)
)

To: Office of the Secretary
Attn: The Commission

JOINT PETITION FOR RECONSIDERATION

**COX BROADCASTING, INC.
MEREDITH CORPORATION
MEDIA GENERAL, INC.
MCGRAW-HILL BROADCASTING COMPANY
COSMOS BROADCASTING CORPORATION
EVENING POST PUBLISHING COMPANY**

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SUMMARY

Cox Broadcasting, Inc.; Meredith Corporation; Media General, Inc.; McGraw-Hill Broadcasting Company, Inc.; Cosmos Broadcasting Corporation; and Evening Post Publishing Company (collectively, “Joint Petitioners”) submit this Joint Petition for Reconsideration of certain aspects of the Commission’s decision in the referenced proceeding adopting new children’s programming rules. Joint Petitioners are experienced broadcasters who own and operate a total of eighty-one television stations in small to large markets throughout the country.

By this Petition, Joint Petitioners request that the Commission reconsider its new rules and adopt the following proposals: (1) exempt from the quarterly, ten percent preemption cap those children’s programs that are rescheduled in accordance with the Media Bureau’s preemption policies; (2) exempt from the requirement to broadcast additional core hours those digital program streams that broadcast non-entertainment programming; (3) confirm that the rule prohibiting the display of website addresses does not apply to interstitial program material such as station identifications, public service announcements, promotional announcements, and informational crawls. These modifications would serve the public interest by preserving the provision of local, news, and informational programming without threatening the provision of educational and informational television programming for children.

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Cox Broadcasting, Inc. (“Cox”); Meredith Corporation (“Meredith”); Media General, Inc. (“Media General”); McGraw-Hill Broadcasting Company, Inc. (“McGraw-Hill”); Cosmos Broadcasting Corporation (“Cosmos”); and Evening Post Publishing Company (“Evening Post”) (collectively, “Joint Petitioners”), by their attorneys and pursuant to Section 1.429 of the Commission’s Rules,¹ hereby submit this Joint Petition for Reconsideration (“Petition”) of certain aspects of the Commission’s decision in the above-referenced proceeding adopting new children’s programming rules (the “Report and Order”).²

Joint Petitioners are experienced broadcasters who are dedicated to serving their communities and have a strong interest in providing educational and informational programming for children. The Joint Petitioners own and operate a total of eighty-one television stations located in markets ranging in size from San Francisco, Atlanta, Denver, Tampa-St. Petersburg,

¹ 47 C.F.R. § 1.429 (2003). Public notice of the Report and Order was published on January 3, 2005. Accordingly, this petition for reconsideration is timely filed. *See 70 Federal Register 25* (Jan. 3, 2005); 47 C.F.R. §§ 1.429(d), 1.4(b) (2003).

² *Children’s Television Obligations of Digital Television Broadcaster, Report and Order and Further Notice of Proposed Rulemaking*, MM Docket No. 00-167, FCC 04-221 (Nov. 23, 2004) (the “Report and Order”).

and Tucson to Biloxi-Gulfport, Lexington, Kentucky, and Bend, Oregon and include both television stations that are affiliated with the major networks and those that are independent. Consequently, Joint Petitioners collectively offer the Commission the benefit of extensive and broad expertise in television broadcasting.

During reviews of their television stations' operations in light of the new children's programming rules, Joint Petitioners universally discovered that application of certain of the new rules would result in adverse ramifications that the Commission likely did not intend. Specifically, the new quarterly, ten percent preemption limit for children's programming, the requirement for additional core programming on all digital multicast channels, and the prohibition on display of website addresses during children's programming, as currently adopted, would disserve the public interest by diminishing the quantity of local, news, and informational programming and impose an undue hardship on television stations. By this Petition, Joint Petitioners respectfully bring these issues to the Commission's attention and request that the Commission adopt the following important revisions to address the anomalous effects of its new rules: (1) exempt from the quarterly, ten percent preemption cap those children's programs that are rescheduled in accordance with the Media Bureau's preemption policies; (2) exempt from the requirement to broadcast additional core hours those digital program streams that broadcast non-entertainment programming such as twenty-four hour news; and (3) confirm that the rule prohibiting the display of website addresses does not apply to interstitial program material such as station identifications, public service announcements ("PSAs"), promotional announcements, and informational crawls. By reconsidering these limited aspects of the Report and Order, the Commission would promote the provision of educational and informational programming to

children while avoiding the unintended results of diminishing the quantity of local, news, and informational programming provided to the public.

I. THE QUARTERLY TEN PERCENT PREEMPTION LIMIT SHOULD NOT APPLY TO PROGRAMMING MADE GOOD IN ACCORDANCE WITH THE MEDIA BUREAU'S PREEMPTION POLICIES.

Under the Commission's renewal application processing guidelines implementing the Children's Television Act of 1990, the Media Bureau staff may approve the children's educational programming portion of the license renewal application of a television station that has aired at least three hours per week of core programming, as averaged over a six month period, throughout its license term.³ If a licensee airs less than three hours per week of core programming, it may obtain FCC staff-level approval if it can demonstrate that it aired a package of educational and informational programming evidencing a level of commitment to educating and informing children that is at least equivalent to airing three hours per week of core programming. If it cannot meet this standard, the licensee must demonstrate to the Commissioners that it complied with the Children's Television Act of 1990 through other means.⁴

The Commission has specified a number of requirements in order for a children's program to qualify as "core," and one of these requirements is that the program be "regularly scheduled." When the FCC adopted its core programming requirement, it afforded the staff the discretion to determine whether a specific number of preemptions would prevent an educational program from qualifying as a core program.⁵ The FCC staff issued letters in the late 1990's in response to inquiries from ABC, CBS and NBC and provided network affiliates with limited

³ See Report and Order at ¶ 12.

⁴ *Id.*

⁵ *Id.* at ¶ 36.

flexibility to reschedule preempted educational and informational children's programs without jeopardizing the program's status as "regularly scheduled" so long as the network affiliate rescheduled the preempted program, furnished publishers of programs guides with the alternate broadcast date and time, and notified viewers of the preemption.⁶ The FCC staff also stated that programs that were preempted due to breaking news were not required to be rescheduled due to the plain public interest benefit of notifying viewers of breaking news.⁷

Despite its belief that most stations do not preempt more than ten percent of core programs per quarter,⁸ in the Report and Order, the Commission imposed a strict limit that core programming cannot be preempted more than ten percent per calendar quarter, even if the program is rescheduled.⁹ The Commission retained the exemption to the requirement to reschedule programs that are preempted for breaking news and also exempted from the ten percent limit those preemptions for breaking news.¹⁰ Thus, under this new preemption limit, if a broadcaster preempts a weekly, half-hour program more than once during a quarter for any reason other than breaking news, the program is disqualified from being core programming, and the broadcaster therefore would lose a half-hour of core programming per week for that quarter.

⁶ See, e.g., *id.* at ¶ 37; Letter from Chief, Mass Media Bureau, to Mr. Alan N. Braverman, Senior Vice President & General Counsel, ABC, Inc., 8 CR 1036 (July 11, 1997); Letter from Chief, Mass Media Bureau, to Mr. Rick Cotton and Ms. Diane Zipursky, National Broadcasting Company, Inc., 8 CR 1036 (July 11, 1997); and Letter from Chief, Mass Media Bureau, to Mr. Martin Franks, Senior Vice President, Washington CBS, Inc., 8 CR 1036 (July 11, 1997).

⁷ See Letter from Chief, Mass Media Bureau, to Mr. Alan N. Braverman, Senior Vice President & General Counsel, ABC, Inc., 8 CR 1036 (July 11, 1997) ("Presentation of breaking news is plainly in the public interest.").

⁸ Report and Order at ¶ 42 ("We believe that most stations currently do not preempt more than 10 percent of core programs in each calendar quarter.")

⁹ This rule becomes effective on January 1, 2006.

¹⁰ Report and Order at ¶¶ 39, 41.

The Commission's new limitation completely eliminates any flexibility for stations and fails to consider structural issues in the network affiliated industry and time zone issues. The new preemption limit will effectively prevent most network affiliates from counting *any* educational and informational programming toward their core programming guidelines during at least one quarter of each calendar year. At various times throughout the year, the "Big Four" broadcast networks offer live coverage of collegiate and professional sporting events that are popular with both children and adults. To accommodate viewers' interest in watching these programs live, network affiliates must preempt their Saturday and/or Sunday morning children's programs and, to the extent possible, reschedule them to other time slots in accordance with the Media Bureau's preemption policies. Already, it is exceedingly difficult for network affiliates to comply with the preemption policies, especially for those television stations located in the Western time zone who broadcast local and national news on weekend mornings.

The new preemption cap would further complicate licensees' efforts to comply with the core programming guidelines and their obligation to serve viewers' interests and their contractual commitments to networks because the new cap, as currently written, does not excuse preemptions that are made good in accordance with the Media Bureau's policies. Examples of these situations are as follows:

- West Coast network affiliates face significant disadvantages *vis a vis* East Coast affiliates because network sports typically begin as early as 10 am local time on the West Coast. During the first quarter of 2005, for example, Fox will be preempting children's programming to provide live coverage of popular NASCAR races; during the second quarter, Fox will be preempting children's programming due to both NASCAR and NFL Europe; and during the third and fourth quarters, Fox will be preempting children's programming for Major League Baseball and NFL Football. Unless West Coast Fox affiliates replace their local newscasts on weekends with children's programming, these affiliates will not be able to count *any* children's programming broadcast on weekends toward their core programming obligations.

- West Coast CBS affiliates face similar disadvantages. During the first quarter, CBS broadcasts the NFL playoffs, college basketball, and NCAA basketball tournaments; during the second quarter CBS broadcasts golf; during the third quarter CBS broadcasts the U.S. Open, NFL and college football; and during the fourth quarter, CBS broadcasts NFL and college football. As with West Coast Fox affiliates, the broadcast times for these sports programs are three hours earlier than for East Coast affiliates. Similarly, unless West Coast CBS affiliates replace their local news on weekend mornings with children's programming, they may be faced with not being able to count any children's programming broadcast on weekends toward their core programming obligations.
- NBC preempts its children's line-up in July for Wimbledon and biennially in September for the Ryder Cup. With two network preemptions during one calendar quarter, NBC affiliates would exceed the ten percent preemption limit in the third quarter. As such, the entire children's programming line-up will no longer count as core – even if the affiliate reschedules the programming to another core time slot and otherwise complies with the preemption policies. **NBC affiliates therefore will be deemed to have broadcast zero hours of core programming during these quarters, despite broadcasting thirteen episodes of six different thirty minute E/I programs every week during the quarter!**

As illustrated by just these three examples, under the new preemption limit, Joint Petitioners' network affiliates are at risk of falling below the three hours benchmark due to network sports preemptions. Joint Petitioners have carefully researched their options for rescheduling their children's programming to time slots that will not be preempted by the networks for sports and/or for scheduling additional children's programming to provide a safety buffer of core hours in case unforeseen preemptions disqualify any of the programs as core (which often occur due to sports overruns and last minute schedule changes mandated by sports leagues and networks). Unfortunately, this is not as easy as it sounds. Joint Petitioners are struggling to find available alternate time slots for children's programming. While three hours of core programming per week may seem like a minimal requirement, coupling the requirement with a ten percent preemption limitation fails to consider special circumstances, such as the problem of West Coast affiliates or those affiliates in any time zone that air news on weekend mornings. Stations have been unable to find solutions because their commitments to network

sports, long-term syndication and network contracts (which extend well beyond the January 1, 2006 effective date of the preemption limit), and, in many cases, local and national news on weekend mornings collectively restrict the available time periods for children's programming. Some station managers are faced with eliminating news and/or local programming as their only available solution – one which they are loathe to implement. The Commission's new ten percent preemption cap, however, perversely appears to require just this result. To take just two examples:

- One of Cox's major market ABC affiliates airs eight and one-half hours of local news every weekend. The station airs news from 6am-10am and 12pm-12:30pm on Saturdays and from 7:30am-11am and 12-12:30pm on Sundays. After 12:30pm on Saturdays and Sundays, ABC typically produces live coverage of sporting events that often causes more than one preemption of children's programming during a quarter. Under the new preemption cap, even made good episodes would count as "preempted." Thus, the station is faced with eliminating a portion of its local newscast to schedule children's programming to avoid the risk of triggering the new ten percent preemption cap.¹¹
- Media General prefers for its stations to carry three hours of core children's programming in their usual timeslots, but situations arise throughout the year that require preemptions of core programs. These preemptions may be the result of programs specified in network agreements (for example, British Open Golf, Wimbledon), while others are the result of local decisions to broadcast live coverage of local events of interest (for example, local children's fairs, local parades). When children's programming is preempted, station staff work extremely hard to ensure that the preempted programming is properly aired in its second home and promoted appropriately. Media General has determined that the new ten percent preemption cap will preclude most stations from preempting any children's programming because the make-goods will put the stations' licenses at risk. As a result, stations appear to be unlikely to honor contractual commitments to air network sports or to provide live coverage of local events of interest to their communities.

¹¹ The station does not have time available during the week to schedule children's programming due to network and syndication contractual obligations that extend beyond January 1, 2006.

Surely, the Commission could not have intended that the new ten percent preemption cap would result in the diminishment of local news and information programming; yet, television stations from coast to coast have no other prudent choice. The public interest requires the Commission to avoid such a result. Specifically, the Commission should continue to permit television stations to count towards core programming those preempted children's programs that are rescheduled in accordance with the Media Bureau's preemption policies. These preemption policies require advance notice to viewers and program guide publishers, and therefore would address the Commission's concern that parents and children be able to locate and view core programming.¹² **Importantly, stations that reschedule these programs would still be providing three hours of core programming to children per week.** This simple modification of the new rule will allow the Commission to avoid significant inconvenience to viewers while affording television stations the flexibility to continue airing free over-the-air news and information to the benefit of the public.¹³

¹² Report and Order at ¶ 42.

¹³ Joint Petitioners request Commission confirmation that unforeseeable disruptions in children's programming due to *force majeure* events such as lightning strikes, tower collapse, transmitter failures, or equipment problems due to technical challenges in connection with transitioning to digital operations, do not constitute preemptions of children's programming. As in the business world in which a failure to perform due to *force majeure* events typically does not constitute a breach of an agreement, and as in the case of the Commission's own procedures in which closures and system malfunctions due to *force majeure* events typically result in extensions and other reasonable relief, *force majeure* events preventing a television station from transmitting a signal should not be treated akin to preemptions that result from decisions to broadcast alternative programming. In other words, Joint Petitioners request that the Commission confirm that *force majeure* preemptions are akin to breaking news preemptions for purposes of its core programming guidelines.

II. ADDITIONAL CORE OBLIGATIONS SHOULD NOT BE IMPOSED ON NON-ENTERTAINMENT PROGRAMMING BROADCAST ON A MULTICAST CHANNEL.

In the Report and Order, the Commission adopted an increased core programming requirement for additional digital streams of free video programming.¹⁴ Effective on January 1, 2006, for each full-time stream of additional free video programming in addition to the main digital program stream, a television station must broadcast an additional three hours per week of core programming.¹⁵ In adopting this requirement, the Commission recognized that broadcasters are beginning to broadcast digital multicast channels that provide specialized content, such as all news or weather formats.¹⁶ The Commission agreed that channels with such specialized content may not be appropriate for the carriage of children's programming.¹⁷ Thus, the Commission stated that broadcasters may air this additional core programming either on this particular digital stream or an alternate stream as long as the stream on which the core programming airs has comparable carriage on multichannel video program distributors ("MVPDs") as the stream triggering the core programming obligation.¹⁸

The Commission's new rule imposing additional programming obligations on multicast channels is exceedingly premature given that multicasting is an experimental, entrepreneurial business that is in the very early stages of development in the media industry and the

¹⁴ Report and Order at ¶ 19.

¹⁵ *Id.*

¹⁶ *See id.* at ¶ 25.

¹⁷ *See id.* ("If, for example, alternative content streams are used to directly expand the value of the main stream through the broadcasting of associated information or different camera angles or the alternative streams are used for low bit rate video services such as a dedicated weather channel, they may not be appropriate for the carriage of children's programming.")

¹⁸ *Id.* at ¶ 24.

Commission has not established rules regarding MVPD carriage of multicast channels. Rather than cultivating this burgeoning industry, the additional programming obligations will effectively squelch the incentive that broadcasters may have to experiment with multicast channels and will hamstring the fledgling business in its very early stages of development. Such a result clearly is contrary to the Commission's goals. In adopting this rule, the Commission emphasized that it did not want to "discourage broadcasters from experimenting with innovative multicasting services" or "discourage [them] from providing highly specialized channels on which content directed to children might depart from the specialized focus."¹⁹ Yet, this increased core programming rule will do just that -- it will create strong disincentives for broadcasters against experimentation with specialized multicast channels.

Joint Petitioners themselves have begun experimenting with the opportunities afforded by multicasting and will be unduly hampered by this new rule. Examples include the following:

- ABC affiliates including Cox's WSB-TV in Atlanta, have broadcast ABC NewsNow, a twenty-four hour news channel, on a digital multicast channel.
- Several of Media General's stations, including WKRG(TV) in Mobile, broadcast a continuously updated Doppler or other weather radar image of the local viewing community on a twenty-four per day multicast channel.
- Cosmos' WTOL-TV, Toledo, Ohio, broadcasts on one of its digital multicast channels a twenty-four hour locally produced, continuously updated Weather Channel, featuring both live radar images and on-camera reports from its meteorologists.
- Some television stations in rural areas are exploring twenty-four per day agriculture reports for their multicast channels.
- Stations in areas with growing minority communities are looking toward foreign-language local newscasts and other programming for their multicast channels.

¹⁹ *Id.* at ¶ 25.

Under the Commission's new rule, television stations broadcasting twenty-four hour news and information channels effectively will be compelled to preempt their public affairs programming to provide additional public affairs programming in the form of three additional hours of children's programming. Many stations do not even have the technical capability to insert commercials, much less children's programming, on these multicast channels, and therefore will be forced to go dark in the face of this additional programming requirement.²⁰

Even if stations could preempt their news and weather channels for children's programming, the programming would not reach the desired audience. The public today views non-broadcast television channels as genre-based (*e.g.*, all music, all sports, all business news, all politics). As broadcasters begin to offer free genre-based multicast channels such as ABC NewsNow and NBC WeatherPlus, viewers simply will not consider tuning to these news and information channels to find children's programming. Not only will children not tune to the Doppler weather channel to watch children's programming, adults will not understand why their weather radar is being preempted for children's programming.

It would thus be more prudent and beneficial to broadcast all children's programming on a dedicated multicast channel that parents and children understand is a source for such programming. Indeed, the Commission recognized in its Report and Order that broadcasting children's programming on a twenty-four hour multicast news channel is not appropriate.²¹ The Commission's solution to this problem is infeasible. Specifically, although the Commission would allow television stations to move additional core programming to another multicast

²⁰ As discussed herein, moving the additional core programming obligation to an alternative multicast channels is infeasible because MVPDs do not yet provide comparable carriage for multicast channels.

²¹ *See id.*

channel with “comparable” MVPD carriage, MVPDs in fact do not provide comparable carriage for all multicast channels. The Commission has not yet established rules regarding multicast must carry, and, in the Joint Petitioners’ collective experience, MVPDs generally refuse to carry any programming stream other than the primary channel and, in some instances, twenty-four hour news and information channels. Some MVPDs flatly refuse “as a matter of policy” to accept carriage obligations for multicast channels that are not broadcast twenty-four hours per day, while others simply refuse to carry any multicast channels without their prior editorial approval.

Consequently, the Commission’s new rule will result in precisely the perverse outcome that the Commission attempted to avoid: the withdrawal of the free news and information multicast channel from the public or the preemption of free news and information multicast channels for children’s programming. Joint Petitioners respectfully submit that the Commission should address this problem by exempting non-entertainment programming from the new trigger to provide additional core programming on digital streams. Thus, multicast channels used to provide news and information to the public – a free service to viewers and often a source of little if any revenue to broadcasters – would not trigger additional core programming obligations that threaten the very existence of the new programming services.

In the alternative, the Commission should waive the “comparable carriage” element of its digital core programming guidelines until MVPDs are required to carry all free over-the-air programming channels broadcast by television stations and provide an exemption to the additional core programming requirement for stations that do not have the technical capability to insert programming on their multicast channel. Either action would be consistent with the Commission’s policy goals of promoting news and information. Either action would avoid

adversely affecting the public interest because, as noted, the public will not look to news and information channels for children's programming. Finally, either action would directly benefit the public interest by encouraging broadcasters to continue experimenting with innovative uses of multicast technology to provide free news and information services to local audiences.

III. INTERSTITIAL PROGRAMMING MATERIAL SHOULD NOT BE SUBJECT TO THE WEBSITE ADDRESS RULE.

The Report and Order also adopted a new rule that will prohibit the display of website addresses during programming directed to children 12 and under.²² Commercial matter will not be subject to the website address prohibition, with the exception of host-selling restrictions.²³ Joint Petitioners request that the Commission modify its new prohibition on the display of website addresses during children's programming to exempt interstitial material such as station identification, PSAs, promotional announcement, and informational crawls, which heretofore have not been deemed to be "commercial matter" for purposes of the commercial limits rules.

Under the Commission's current policy, "[c]ommercial matter" is defined to exclude certain types of program interruptions from counting toward the commercial limits, including promotions of upcoming programs that do not mention sponsors, public service messages promoting not-for-profit activities, and air-time sold for purposes of presenting educational and informational material."²⁴ Because this interstitial program material does not constitute commercial matter, it would all become subject to the new rule prohibiting the display of most

²² See *id.* at ¶ 50. On January 31, 2005, the Commission deferred the effective date of the website prohibition from February 1, 2005, to January 1, 2006. *Children's Television Obligations of Digital Television Broadcaster, Order on Reconsideration*, MM Docket No. 00-167, FCC 05-22 (Jan. 31, 2005).

²³ See *id.* at ¶ 51.

²⁴ *Id.* at ¶ 55.

website addresses. The Commission could not have intended this result. Most PSAs, station identification announcements, and program promotions include URLs directing viewers to websites that provide further information about the respective organization, cause, station, or program. A review of these URLs confirms that most do not comply with the Commission's new website guidelines. As a result, broadcasters must either "scrub" all such interstitial material of URLs or simply adopt a blanket policy prohibiting the broadcast of all but a very small handful of PSAs and virtually no program promotions – including those included in network and syndicated programming. Such a result would not serve the viewing public and certainly would not advance the Commission's goals of protecting children from excessive exposure to commercial matter.

Likewise, television broadcast stations that broadcast informational crawls across programming to alert viewers to breaking news, weather emergencies, and school closings will risk violating the Commission's new rule limiting the display of websites during children's programming under the current formulation of the Commission's new website display rule. To avoid preempting a program entirely, television stations typically provide critical information through the crawls, and then advise viewers to continue watching the station and/or direct viewers to the station's website for updates and additional information.²⁵ Indeed, most of Joint Broadcasters' television stations' websites routinely provide up-to-the-minute radar images, detailed weather-related street and school closings, traffic advisories, information on shelters,

²⁵ For example, a crawl might advise viewers, "Winter weather warning....Stay tuned for news at noon for more information and go to [station website] for Doppler radar and weather-related closings." By directing viewers to the station's newscast, this crawl also may be deemed to implicate the new rule that promotional announcements for programming that is not educational and informational for children will count as commercial matter. Joint Petitioners request that the Commission confirm that informational crawls are exempt from this new rule lest television stations be prohibited from advising viewers of the timing of the next update.

evacuation routes, and other crucial information to the public that cannot readily be converted to a one or two-sentence crawl across the screen.

The Commission's new rule limiting the display of website addresses during children's programming prevents television stations from displaying their websites during informational crawls because such websites do not comply with the Commission's noncommercial website criteria. Thus, the new rule will force television stations (i) to avoid directing viewers to their websites for more information, (ii) to preempt the children's program entirely for a newsbreak, or (iii) to forgo providing informational crawls during children's programming. The Commission could not have intended to produce such a result with its new rule, because any of these alternatives would threaten public safety and provide a tremendous disservice to the public.

Consequently, Joint Petitioners respectfully request that the Commission modify its new website rule as necessary to preserve the historical exemption to its commercial limits policies for interstitial program material such as station identification announcements, PSAs, program promotions and informational crawls.

CONCLUSION

Certain elements of the Commission's new children's programming rules produce unintended, adverse consequences that will disserve the public interest by diminishing the amount of news and informational programming available to viewers. Joint Petitioners urge the Commission to avoid these consequences by revising its new rules as detailed herein. By adopting these minor revisions to the children's programming rules, the Commission can ensure that broadcasters may continue to serve the public interest by providing educational and informational children's programming and news and information to their communities.

Respectfully submitted,

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