

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

In the Matter of)
)
Review of the Emergency Alert System) EB Docket No. 04-296
)

To: The Commission

**COMMENTS OF
THE NATIONAL ASSOCIATION OF BROADCASTERS**

**NATIONAL ASSOCIATION OF
BROADCASTERS**

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TABLE OF CONTENTS

Executive Summary	i
I. Introduction.....	1
II NAB Supports The Commission’s Efforts To Improve EAS Through Digital Technologies And The Adoption Of A Common Protocol Language	3
III. The Commission Should Not Impose Transcription Requirements For Audio EAS Messages.....	7
IV. The Commission Should Continue To Explore Voluntary Means By Which Multilingual EAS Messages Can Be Disseminated.	13
V. Conclusion	16

Executive Summary

The National Association of Broadcasters hereby comments in response to the *Further Notice of Proposed Rulemaking* in the Emergency Alert System (“EAS”) proceeding.

NAB applauds the Commission for its continuous efforts to improve public warning, and we welcome the opportunity to comment on the issues raised in the *Notice*. Informing the public of national, state and local emergencies is the hallmark of broadcasters’ public service. Through the use of live news coverage and EAS, broadcasters have invested millions of dollars to ensure that the local communities they serve have timely access to critical, and often life-saving, information. The most recent examples of this commitment to public service are the heroic efforts of broadcasters to stay on-air to deliver round-the-clock news coverage to their communities during Hurricanes Katrina and Rita.

As we begin to explore the means by which new and emerging digital technologies may enhance public warning, broadcasters remain committed to serving their communities. As evidenced by the recent hurricanes, this service extends well beyond the EAS architecture. In an era of instantaneous communications, those in the broadcast audience are provided with a wealth of emergency and critical information through regular broadcast programming that dwarfs the information provided through EAS.

NAB supports many of the Commission’s proposals to enhance public warning, including incorporating digital technologies and the adoption of a common protocol language. We also applaud the Commission’s continued efforts to ensure that all Americans, including those with hearing and visual disabilities, as well as non-English speaking persons, have access to emergency information. However, NAB urges the Commission to refrain requiring audio

transcription of EAS messages because it is a *de facto* real-time captioning requirement that we believe, at this stage, would more likely impede the timely dissemination of emergency information. And because Minority Media Telecommunications Council, *et al.*'s *Petition* raises numerous statutory and practical issues that need to be addressed first, the Commission should refrain from implementing its proposed multilingual emergency alert system. In lieu of further regulation, NAB urges the Commission to continue to work with broadcasters to implement voluntary measures for improving public warnings and alerts.

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I. Introduction.

The National Association of Broadcasters (“NAB”)¹ submits these comments in response to the Commission’s *Further Notice of Proposed Rulemaking* in the above-captioned proceeding.² NAB applauds the Commission for its continuous efforts to improve public warning, and we welcome the opportunity to comment on the issues raised in the *Notice*. Informing the public of national, state and local emergencies is the hallmark of broadcasters’ public service. Through the use of live news coverage and the Emergency Alert System (“EAS”), broadcasters have invested millions of dollars to ensure that the local communities they serve have timely access to critical, and often life-saving, information. Recent examples of this commitment to public service are the

¹ NAB is a nonprofit, incorporated association of radio and television stations and networks that serves and represents the American broadcasting industry.

² In the Matter of Review of the Emergency Alert System, *Report and Order and Further Notice of Proposed Rule Making*, EB Docket No. 04-296, rel. Nov. 10, 2005 (“*Notice*”).

heroic efforts of broadcasters to stay on-air to deliver round-the-clock news coverage to their communities during Hurricanes Katrina and Rita.³

As we begin to explore the means by which new and emerging digital technologies may enhance public warning, broadcasters remain committed to serving their communities. As evidenced by recent tragedies, this service extends well beyond the EAS architecture. In an era of instantaneous communications, those in the broadcast audience are provided with a wealth of emergency and critical information through regular broadcast programming that dwarfs the information provided through EAS.

As discussed in detail below, NAB supports many of the Commission's proposals to enhance public warning, including incorporating digital technologies and the adoption of a common protocol language. We also applaud the Commission's continued efforts to ensure that all Americans, including those with hearing and visual disabilities, as well as non-English speaking persons, have access to emergency information. The Commission, however, should refrain from implementing proposals, such as transcription and multilingual requirements that, at this stage, are likely to impede the timely dissemination of emergency information, as opposed to its intended goal. Rather, NAB urges the Commission to continue to work with broadcasters to implement voluntary measures for improving public warnings and alerts.

³ A copy of NAB publications *Snapshot of Broadcasters' Efforts to Stay On The Air During Hurricane Katrina* (Sept. 2005) and *Update on Broadcasters' Help with Hurricane Katrina Relief* (Sept. 13, 2005) are attached to these comments as Appendix A.

II. NAB Supports The Commission’s Efforts To Improve EAS Through Digital Technologies And The Adoption Of A Common Protocol Language.

Broadcasters are proud partners with the government in public warning. As a universal and free-over-the air service, local broadcasters’ television household penetration rates reach 98.2% of the approximately 112,232,500 American households.⁴ Local radio reaches a weekly audience of 228,910,000 persons.⁵ Through their ability to reach the virtually all Americans, broadcasters are keenly aware of the unique role they play in disseminating emergency information. From the creation of AMBER alerts for abducted children, to coordinating with state and local emergency planners, to their active participation in the Media Security and Reliability Council (“MSRC”), broadcasters are committed to serving their local communities.

Although the Commission states that, due to the Internet’s “inherent robustness,” it should “serve an important role in the distribution of alerts and warnings,”⁶ NAB cautions that during times of significant disasters, access to both electrical power and Internet services may be disrupted or completely cut-off. In fact, as MSRC recognized, “[e]mergency communications plans must take into account the probability of widespread power outages when AM and FM radio is the *only way* to communicate to battery powered receivers in the community.”⁷ To the extent that a natural or man-made catastrophic event may cut off public access to other forms of communications, *i.e.*, cable, satellite, Internet, wireless telephony, etc., EAS can continue to operate. Thus,

⁴ See Nielsen Media Research TV Household Estimates, 2005-2006.

⁵ See RADAR, Fall Survey Reports, Copyright Arbitron.

⁶ Notice at ¶ 66.

⁷ Media Security and Reliability Council, Public Communications and Safety Working Group, *Final Report*, February 18, 2004 at 15.

broadcasters wholly concur with the Commission that EAS “should remain an important component of any future alert and warning system.”⁸

NAB also supports the Commission’s efforts to incorporate digital technologies to improve EAS. Digital media such as DTV and HD-Radio have the capability to provide greatly improved EAS functionality, due to these systems’ ability to carry significantly more information than analog TV and radio⁹ Digital broadcasters will therefore have the capacity to carry significantly increased amounts of data that could be used both to provide vital emergency information to the public and to support first responders as well. But currently EAS, which was created before the advent of digital broadcasting, cannot take advantage of digital broadcasters’ enhanced capabilities to provide a broader range of information that the public may need during emergencies.

NAB suggests that the Commission differentiate between the architecture needed to deliver emergency messages created at a local emergency operations center (“EOC”) to the media and other communications services (including public safety officials) from the distribution path needed to deliver emergency information from the media to the public. The *Notice* proposes a point-to-multipoint architecture in which an EAS message is distributed directly to various media outlets, rather than to a single broadcast station and then distributed via a “daisy chain” of stations to the public. *Notice* at ¶ 66. NAB agrees that the point-to-multipoint delivery system has merit in satisfying the first step in getting a message from an EOC to the media. This concept provides a level of redundancy that will increase the reliability of EAS.

⁸ *Notice* at ¶ 18.

⁹ DTV operates at 20 Mbps and HD-Radio operates at 96 Kbps for FM and 36 kbps for AM.

The exact implementation of this point-to-multipoint delivery system, however, depends on the specific requirements and resources available to each state, county or municipality. For example, satellite distribution can allow messages to reach many receivers at the same time, but these networks are expensive to build and maintain. Internet distribution may be an option for some, but quality of service varies depending on the level of connectivity available at different locations. The Commission should therefore encourage each emergency management entity to look at all options available and implement the ones that provide the highest level of redundancy and reliability.

For delivery of emergency information from the media to the public, broadcasters continue to be the most reliable and robust means of distribution.¹⁰ And in a digital EAS environment, if appropriate, other communications outlets, such as wireless carriers, could monitor local broadcasters to obtain the digital EAS data and pass it on to their subscribers. In the future, personal digital assistants (“PDAs”) and other wireless devices could integrate enhanced DTV transmission modes¹¹ or HD Radio receivers into their products to provide a truly ubiquitous public alerting system.

¹⁰ The Commission itself has recognized the value DTV receivers have in public warning. In extending the DTV tuner requirement to sets with screen sizes less than 13 inches, the Commission expressly noted “their particular value for enabling the reception of news and public safety information in times of emergency.” In the Matter of Requirement for Digital Television Receiving Capability, *Report and Order*, ET Docket No. 05-24 (Nov. 8, 2005) at ¶ 25.

¹¹ The ATSC DTV standard was developed originally to provide service to fixed reception devices. More recent efforts have been targeted to develop transmission modes for reception under severe reception conditions. For example, the latest version of the ATSC DTV standard includes a robust mode called E-VSB that could be used to insure delivery of digital EAS information to small, portable DTV sets during challenging reception conditions.

While NAB supports ubiquitous methods of alerting the public, the Commission should, however, refrain from requiring broadcasters to display EAS text messages on HD radio receivers. *See Notice* at ¶ 68. As with all consumer devices, the ability to display an alert or react to a digital EAS message is a feature that consumer electronics manufacturers will implement based on the capabilities of a specific product. NAB therefore encourages the Commission to work with manufacturers to include as many advanced features as practicable.

Moreover, to realize the potential for ubiquitous digital emergency warnings, federal implementation of a common alerting protocol, such as the Common Alerting Protocol (“CAP”), is essential. NAB thus supports the adoption and implementation of uniform language, for it is only through its adoption and full implementation that any of the advanced features of the next-generation alert and warning system envisioned by this Commission can be fully realized. *See Notice* at ¶ 64. Ideally, in the future, a local emergency manager could initiate an alert or warning that would be coded in the standardized digital protocol. This digital message would then be distributed to various media outlets and other telecommunications platforms. Each service will have the ability to process, interpret and distribute that warning to the public in a manner that is appropriate for that particular service. Consumer products could also include in their designs the ability to interpret and react to these digital alerts. Broadcasters’ role is as to act as a conduit for these digital alert messages. NAB will continue to work closely with ATSC to develop a standard to carry these digital messages in the DTV signal once the Commission adopts a uniform protocol.

To be sure, whatever protocol the Commission eventually adopts, it is vitally important that it be used by all state and local emergency operations centers. If each

municipality chooses a different alerting protocol, for example, the advantages that digital technology has to offer may be wasted. NAB therefore encourages the Commission to work with the Federal Emergency Management Agency (“FEMA”), the Department of Homeland Security and the emergency management community to help insure that a uniform alerting protocol is ubiquitously adopted.

The Commission, finally, must make certain that any common protocol is fully compatible with existing EAS encoder/decoders and does not obsolete the installed base of equipment. This will ensure a seamless transition to a digital EAS and guarantee that broadcasters can be retained as a backbone for public warning.

III. The Commission Should Not Impose Transcription Requirements For Audio EAS Messages.

The Commission queries “whether entities that are subject to the Commission’s EAS rules be required to make an audio EAS message accessible to those with hearing disabilities by using a transcription of the audio message through the use of closed captioning or other methods of visual presentation.” *Notice* at ¶ 79. The goal of this proposed rule is laudable, but because of inherent limitations of real-time stenocaptioning services and the severe constraints emergencies place on broadcast resources, such regulation could very well act as a deterrent to the dissemination of information about state and local emergencies. As detailed below, NAB strongly urges the Commission to refrain from adopting the proposed rule at this time.

As an initial policy matter, Commission’s proposed transcription rule appears to be a departure from its stated mission to develop a “fully integrated, state of the art, digitally-based public alert and warning system for the American public.” *Notice* at ¶ 16. For if the Commission requires that the video feed match the audio, it renders EAS

equipment, and the EAS-generated video text messages, obsolete. EAS was designed to be an equipment-driven warning system. No matter what time of the day or night an emergency occurs, EAS encoding and decoding equipment can be triggered to automatically deliver emergency information over radio and television broadcast stations. The EAS equipment also allows a television broadcast station to display a visual crawl that includes the elements of the EAS header code, including the originator, event, location and the time period covering the EAS message. *See* 47 C.F.R. § 11.51(d), (g)(3), (h)(3). Alternatively, the broadcaster may interrupt regular programming for live coverage of the emergency event. EAS equipment is simply not designed to provide audio transcriptions in visual display form.

Aside from the policy concerns about the basic concept of EAS, as a practical matter, the Commission's current rules already address emergency information for hearing impaired persons (as well as visually impaired persons). Specifically, Section 79.2 of the Commission's rules requires video programming distributors to make the audio portion of emergency information accessible to persons with hearing disabilities using either captioning or a visual presentation. *See* 47 C.F.R. § 79.1(a)(2). Section 79.2 covers all emergencies, whether or not they are aired as an EAS alert. The Commission's current rules are designed to be flexible to allow broadcasters to use a multitude of video presentations, including graphics, maps, open captions, or other crawls to disseminate emergency information. In fact, broadcasters can continue to display the EAS visual text crawls at the bottom of the screen while providing additional visual and aural presentations. In light of these existing rules, the need to impose additional EAS transcription requirements has not been demonstrated.

Perhaps most importantly, the Commission should not impose regulations that strip away broadcasters' flexibility to deliver their voluntarily carried state and local emergency warnings. Indeed, the Commission lacks authority to mandate state and local EAS participation in the first instance. Section 706 of the Communications Act included a grant of authority to regulate emergency broadcasting. This grant, however, applies only to the regulation of broadcasts of *national* emergencies. The language of Section 706(c) specifically states that, “[u]pon proclamation by the President that there exists war or a threat of war, or a state of public peril or disaster or other national emergency,” the President may deem it necessary to alter the rules that otherwise apply to broadcasting stations in order to protect the national security or defense. 47 U.S.C. § 606. Thus, Section 706 is silent as to the federal government’s authority to regulate state and local, (*i.e.*, non-national) emergency warnings.¹²

Because the Commission lacks the authority under Section 706 to mandate state and local EAS plans, state and local participation in EAS and other similar systems has always been voluntary. As a practical matter, nearly all broadcasters participate in disseminating state and local EAS warnings, and provide far greater emergency information during live coverage of state and local emergencies. The Commission’s rules, however, should not be a deterrent to such dissemination. Rather, the key to a successful public warning system, including EAS, is through *voluntary cooperation* of broadcasters and federal, state and local emergency officials.

Voluntary cooperation, however, cannot be readily sustained under the Commission’s proposed EAS transcription requirement. The proposal that the visual

¹² See In the Matter of Review of the Emergency Alert System, *Comments of NAB*, EB Docket No. 04-296, Oct. 29, 2004 at 25-30.

message be identical to the audio feed constitutes a *de facto* requirement that television broadcast stations real-time caption EAS information. As detailed by numerous commenters in the Commission's closed captioning proceeding, there is a significant shortage in the availability of real-time stenocaptioners.¹³ In the event of an emergency, instantaneous securing of real-time stenocaptioner services will often not be possible, particularly for small and medium sized stations that do not have live-captioner contracts with emergency contingencies in place. Even for those stations that do have captioning contracts, due to the stenocaptioning shortage, there may be delays in securing captioning services (particularly if the emergency affects a large area).

Both Congress and the Commission have recognized there may be constraints in securing stenocaptioning services. Section 713 of the Communications Act recognized the need to balance the goal of achieving full accessibility with economic and technical constraints broadcasters and other program producers face. The statute empowers the FCC to exempt programs and classes of programs or services where "the provision of closed captioning would be economically burdensome to the provider owner of such programming." 47 U.S.C. § 613(d)(1). The statute also permits providers and program owners to seek an exemption on a case-by-case basis where captioning requirements

¹³ See In the Matter of Closed Captioning of Video Programming, Reply Comments of NAB, CG Docket No. 05-231, Dec. 16, 2005 at 11-16 (*citing* Comments of Cosmos Broadcasting Corporation, *et al.* at 4 (estimating the number of stenocaptioners at 500); Comments of NCTA at 14 (citing S. Rep. No. 109-93, 109th Cong. 1st Sess. (June 25, 2005)) (estimating there are currently 300 English language and 6 Spanish language trained real-time captioners); Comments of Media Captioning Services at 6 (estimating there are 625-650 real-time captioners, with 450 captioners working for top 4 firms); Comments of Caption Colorado at 19 (stating that approximately 400 real-time captioners currently provide all real-time captioning in the United States (filed Nov. 10, 2005)) (Attached as Appendix B). See also *The Captioning Crisis: A Case for Swift and Decisive Action*, National Court Reporters Association, at 1 (rel. Aug. 22, 2005), found at http://www.ncraonline.org/infonews/press/media_homepage.html).

would create an undue burden. 47 U.S.C. § 613(d)(3). As the Conference Report explained, Congress specifically contemplated under this latter provision that the Commission “shall balance the need for closed captioned programming against the potential for hindering the *production and distribution of programming*.”¹⁴ The Commission too recognized this need for reasonable application of the captioning requirements. Thus, when it concluded on reconsideration that 100% of new nonexempt programming should be captioned, the Commission went on to acknowledge that “[t]here are a variety of circumstances where captioning may be problematic. Such situations include, but are not limited to, equipment failures, the *inability to obtain captioning resources on short notice* or the receipt of programming without the expected captions.”¹⁵

Moreover, during emergencies, it may be physically impossible for stations to secure stenocaptioning services. For example, during Hurricane Katrina, WDSU and WWL in New Orleans had to evacuate their flooding studios and relocate their operations to facilities in Orlando and Baton Rouge, respectively. Thus, the communications lines necessary for real-time stenocaptioning services were literally underwater. It was only through cooperative efforts of all local broadcasters that service to New Orleans was restored.

Faced with an inability to caption emergency information, including those broadcasters for which real-time captioning could be cost-prohibitive,¹⁶ the

¹⁴ See H.R. Report 104-458, 104th Cong. 2nd Sess. (1995) at 182-83 (emphasis added).

¹⁵ In the Matter of Closed Captioning and Video Description of Video Programming, *Order On Reconsideration*, MM Docket No. 95-176, 13 FCC Rcd 19973 (1998) (emphasis added).

¹⁶ The cost of contracting for real-time captioning varies greatly, ranging from \$100 to approximately \$500 per hour. (Captioning costs were obtained via an informal survey of NAB member television stations.) Moreover, the cost to stations is inversely

Commission's proposed rules leave broadcasters with an untenable choice. Either the television broadcaster withholds the EAS alert, which may include critical life-saving information, or the broadcaster airs the EAS visual text crawl (which may not match the aural information) and risks significant fines or other penalties. Neither option benefits the public interest. In this instance, a properly conducted cost/benefit analysis of the proposed regulation, an integral part of agency decision making, would clearly demonstrate that that the proposal to require transcription of an audio EAS message is imprudent.¹⁷

Indeed, any proposed regulation that would discourage broadcasters from providing emergency information is imprudent. As articulated by the Florida Association of Broadcasters in the Commission's closed captioning proceeding, the FCC should avoid creating standards "that would impair the ability of journalists and licensees to make the needed good faith judgment calls required during chaotic and dynamic conditions."¹⁸

Similarly, the Radio and Television News Directors Association noted that the

proportional to a station's "buying power" – small and medium market broadcasters who are not part of a station group typically receive less discounts than stations that are contracting with captioning companies for a "bulk discount."

¹⁷ The Commission is required to reasonably assess the costs its actions. *See, e.g., Motor Vehicle Mfrs. Assn. v. State Farm Mut. Ins.*, 463 U.S. 29, 54 (1983) (agency needs to "look at the costs as well as the benefits" of a regulatory standard); *People of the State of California v. FCC*, 905 F.2d 1217, 1231 (9th Cir. 1990) (reviewing court "must be satisfied that the Commission's assessment of the various costs and benefits is reasonable in light of the administrative record," and "if the FCC's evaluation of any significant element in the cost/benefit analysis lacks record support," then the court "cannot uphold the agency action" under the Administrative Procedure Act); *United States Telecom Association v. FCC*, 227 F.3d 450, 461 (D.C. Cir. 2000) (finding that FCC's failure to explain how it implemented provisions of the Communications Assistance for Law Enforcement Act in a "cost-effective" manner was "a classic case of arbitrary and capricious agency action").

¹⁸ In the Matter of Closed Captioning of Video Programming, *Comments of the Florida Association of Broadcasters*, CG Docket No. 05-231, Nov. 10, 2005 at 4.

Commission's current "no exceptions" policy of "requiring 'simultaneous or nearly simultaneous' presentation of aural and visual critical emergency information ... places broadcasters in the untenable situation of withholding information until real-time captioning can be activated or appropriate personnel are in place to prepare visuals").¹⁹ NAB thus urges the Commission not to further deter the dissemination of emergency information by adopting the proposed transcription requirement.

In lieu of additional regulatory mandates, the Commission should instead focus on how, through *voluntary cooperation and coordination*, public warnings can be enhanced for all persons, including those with hearing disabilities. NAB recommends that the Commission work with industry to develop feasible solutions for improved, cost-effective methods of captioning emergency information, including the development of voice-recognition, upgraded EAS software or other technologies that may enhance the quality of the visual text EAS information displayed onscreen. The Commission should ensure that it leave providers with sufficient flexibility so as to avoid a loss of emergency information for the public at large while meeting the needs of the hearing-impaired.

IV. The Commission Should Continue To Explore Voluntary Means By Which Multilingual EAS Messages Can Be Disseminated.

In addition to the proposed transcription requirement, the Commission also seeks comment²⁰ on issues raised by Minority Media and Telecommunication Council, *et al.'s Petition for Immediate Interim Relief*.²¹ Petitioners seek revisions to part 11 of the

¹⁹ In the Matter of Closed Captioning of Video Programming, *Comments of the Radio and Television News Directors Association*, CG Docket No. 05-231, Nov. 10, 2005 at 10-11.

²⁰ Notice at ¶ 81.

²¹ In the Matter of Review of the Emergency Alert System, *Petition for Immediate Interim Relief*, EB Docket No. 04-296, filed Sept. 20, 2005 ("*Petition*").

Commission's rules governing EAS to require the dissemination of multilingual local, state and national emergency information.²² As NAB articulated in our response,²³ while their goal is admirable, Petitioners' proposals raise numerous statutory and practical questions that must be addressed. For example, Petitioners urge the Commission to modify its rules to "provide that the 34 PEP [Primary Entry Point] stations would air all Presidential level messages in both English and Spanish." *Petition* at 13. The Commission, however, does not possess the authority to mandate the content of Presidential level messages. Rather, the FEMA is "responsible for implementation of the national level activation of EAS, test, and exercises."²⁴ Thus, it would appear to be FEMA, in coordination with the Department of Homeland Security and the White House, not the FCC, that can determine that the Presidential level messages will be delivered on a bilingual basis.²⁵

Furthermore, because FEMA has direct authority over state and local emergency funding, it would appear to be the government agency best suited to ensure that all state

²² Current EAS rules provide that EAS announcements may be aired in the same language as the primary language of the station. *See* 47 C.F.R. § 79.2(b)(3).

²³ In the Matter of the Emergency Alert System, *NAB Comments In Response to Petition for Immediate Interim Relief*, EB Docket No. 04-296, filed Oct. 14, 2005 (Attached as Appendix C).

²⁴ In the Matter of Review of the Emergency Alert System, *Notice of Proposed Rule Making*, EB Docket No. 04-296, rel. Aug. 12, 2004 at ¶ 13.

²⁵ As the Commission is aware, the EAS system has never been activated intentionally on a national level. The national component of the EAS legacy system was created at a time when the Executive Office did not have adequate access to media outlets. Today, should the President wish to address the nation, there is nearly-instantaneous access to a multiplicity of media sources. For this reason, it would seem that this aspect of the *Petition* is not critical at this time.

and local governments are fully implementing state and local emergency plans. Under the Stafford Act, the President can:

...establish a program to provide technical and financial assistance to States and local governments to assist in the implementation of predisaster hazard mitigation measures that are cost-effective and are designed to reduce injuries, loss of life, and damage and destruction of property, including damage to critical services and facilities under the jurisdiction of the States and local governments.

42 U.S.C. § 68 (Effective Oct. 30, 2000).

Thus, through existing legislation, such as the Stafford Act, FEMA is already authorized to assist state and local governments in developing emergency plans, including means by which non-English speaking persons can be appropriately warned.²⁶ Obviously state and local emergency governments must receive adequate funding and strong federal guidance to ensure that all jurisdictions are able to meet the public warning needs and first responders' needs of their communities, for both English and non-English speakers alike. NAB urges Petitioners to work with FEMA, broadcasters and state and local governments to explore these issues further.

The *Petition* also raises a number of practical issues that warrant further and careful consideration by the Commission. For example, Petitioners propose that the Commission amend 47 C.F.R. § 11.52(d) to provide that “at least one broadcast station in every market would monitor and rebroadcast emergency information carried by local LP-S and LP-M [Local Primary Spanish and Local Primary Multilingual] stations.” *Petition* at 15. The *Petition* does not, however, explain how such a rule would be implemented.

²⁶ In the same year the Stafford Act was passed, the Executive Office also recognized that future objectives of EAS were “completing development of all State and local EAS plans” and “developing EAS educational and training packages for government and industry personnel.” *Effective Disaster Warnings, Report by the Working Group on Natural Disaster Information Systems Subcommittee on Natural Disaster Reduction, National Science and Technology Council Committee on Environment and Natural Resources, Nov. 2000 at 29.*

To note just one practical problem, the LP-S and LP-M designated stations, however, may be sited in different areas, and thus, it may not be possible (due to intervening terrain or signal obstruction) for a station to monitor multiple stations. Nor is it apparent that a single-monitoring designee would appropriately reach the intended audience. How, for example, would non-English speaking listeners in a given radio market be alerted if they are not tuned into the one “designated” monitoring station?

For these reasons and others, the Commission should not rush to impose additional requirements without knowing how – or even where – they can be effectively implemented. Rather, the Commission should carefully consider how non-English speaking persons are currently receiving their information, including emergency information provided on non-English broadcast channels, so as to ensure that a public warning system designed to reach non-English speakers effectively reaches its intended audience.

V. Conclusion.

For the above-described reasons, NAB has supported in the past and continues to support various efforts to improve EAS and public warning. NAB supports many of the Commission’s proposals to enhance public warning, including enhancing digital capabilities and the adoption of a common protocol language. However, NAB urges the Commission to refrain requiring audio transcription of EAS messages because it is a *de facto* real-time captioning requirement that could likely impede the timely dissemination of emergency information. NAB looks forward to a continued dialogue exploring how local, state and federal agencies, through the voluntary cooperation of broadcasters, can

better serve all Americans, including those with hearing and visual disabilities, as well as non-English speaking persons, during national, state and local emergencies.

Respectfully submitted,

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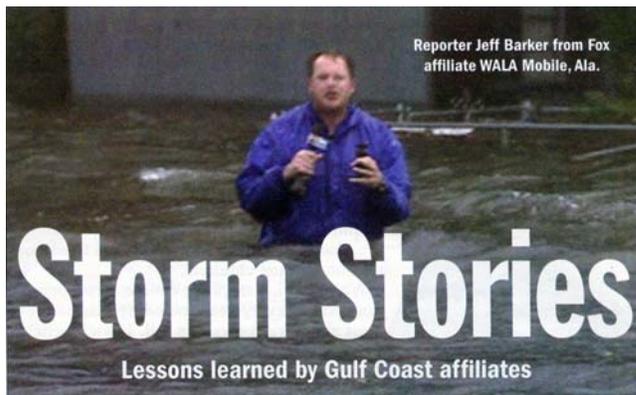


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Appendix A

Snapshot of Broadcasters' Efforts to Stay On The Air During Hurricane Katrina



To continue broadcasting important emergency information, broadcasters had to struggle to form creative partnerships. Those not totally flooded operated with backup generators as long as they could, then partnered with stations outside the heavily affected areas. Some examples as reported in press accounts:

The New York Times

The Radio Station That Could, and Did, and Still Does, Help

By Dan Barry

BATON ROUGE, La., Sept. 8 - The president of St. Tammany Parish was calling in Thursday to say that conditions out there were gradually improving, while Sam from St. Bernard held one line, Adrian from Metairie held another, and Sheila, just Sheila, ached to get on the air with an urgent request.

Her purpose for calling the United Radio Broadcasters of New Orleans, a round-the-clock radio program born of the hurricane, flickered on a monitor in the control room: "Looking for dad in NO East. He refused to evac. Dead? Alive?"



WWL Storm Damage (above)

With many of their worst fears now fact, the people in and around New Orleans have needed to communicate with one another: to seek or offer help, to criticize this agency or

praise that one, to vent, cry, reassure or just find comfort in the soothing radio voice of someone who has shared their loss. Some people might find escape through a country-music station, or affirmation from a local Christian station that suggests that the Sodom known as New Orleans got what it deserved. ("A city cannot be washed clean. ...") But most people here are listening to this program, which is broadcast over several stations to cast a radio-wave net that holds New Orleans together.



"We're still getting calls from people who are trapped," said Dave Cohen, the news director. And their cries for help are passed on to the police - and the New Orleans nation.

He is normally the news director for a station owned by the Entercom broadcasting behemoth: WWL-AM, 870 on the dial for news, talk and sports. But nothing has been normal for him or any of his colleagues, not since he received harried word on the afternoon of Friday,

Aug. 26 - two weeks ago, and a lifetime ago. That hurricane everyone thought would bypass us? Correction: New Orleans is now dead center.

By that Saturday morning, WWL had established a hurricane headquarters in its downtown studios, across from the Superdome, and was alerting a city that still largely believed the storm would pass it by. By that Sunday, Mr. Cohen and three colleagues had opened a satellite operation in Jefferson Parish, outside the so-called bowl, in case the downtown studio and antenna did not survive.

The station broadcast through Sunday night and into Monday morning, its reporters describing what they saw, and when words failed, allowing nature's wrath to howl through their microphones. At one point, the storm blew out the downtown studio's large windows, sending a talk-show host, Garland Robinette, and others scurrying to a back room, where his reports continued.

Calmer skies arrived that Tuesday morning to induce premature sighs of relief, but flooding was occurring in the city and word quickly spread that the 17th Street Canal Levee had a breach.

Mr. Cohen, still in Jefferson Parish, went on the air to sound a warning - "The lake will now start emptying into the city" - then ordered his staff in New Orleans to evacuate. He went back on the air, knowing that with power down, most people could receive information only by radio. "We're it; we're the only lifeline to the people," he said. "I was personally pleading with my listeners to get out of the city."

One frantic woman called in to say that she was standing in water chest-deep, with a 5-year-old and a 2-month-old. Another caller, a blind man, said he did not know where to turn. "I don't know what happened to her," Mr. Cohen said. "I don't know what happened to him."



Back at the downtown studio, many employees managed to flee by car or, eventually, by helicopter. Others, including the morning news anchor, David Blake, and his family, got stuck for several days, so he reported what he saw from the broken-window studio - namely, the infamous chaos at the Superdome, where crushes of people waited and withered.

His early reports had to be redone before they could be broadcast, he recalled. "My news director said I sounded angry and frustrated," he said. "He felt I had become too emotional."

Faced with inaccessible downtown studios and a shared mission, Entercom and its sworn enemy, Clear Channel

Communications, began working together in a venture they called the United Radio Broadcasters of New Orleans. Using Mr. Cohen of Entercom as news director, Clear Channel's studios here in Baton Rouge, and hosts and reporters from both stations, they now broadcast a program that is part news, part counseling.

When local public officials want to lash out at the Federal Emergency Management Agency, they call here. When pastors want to spread word of volunteer efforts, they call here. When people want to report the water levels outside their doors, express concerns about abandoned animals, express pride in a city's determination to rebuild, cry out for help or give thanks for living, they call here. Although the distress calls blend into one full-throated cry of S O S, some linger in the mind. Mr. Blake, for example, still hears one man calling to say, "I've been up in this attic for days; I can't take it anymore."

On Tuesday afternoon, Mr. Cohen's cellphone kept ringing to the tune of "When the Saints Go Marchin' In," with calls from reporters out there somewhere, bearing witness. "You got a full tank of gas and lots of water," he told one. "If you fall below a half-tank, get the hell back."

Meanwhile, in the control room, Kat Kageleiry tried to stay on top of all the phone calls lighting up the switchboard. Sam from St. Bernard. Adrian from Metairie. Poor distraught

Sheila. "I'm going to put you on hold and come to you in a few minutes," she told one caller. "Don't hang up."

THE WALL STREET JOURNAL

From Conservative Talk Format to All Katrina
By Sarah McBride, September 6

Last week, as Hurricane Katrina slammed into New Orleans and cut off electricity, battery-operated radios served as the only source of information for thousands of stranded people.

Yet as most of the city's broadcast outlets were temporarily silenced by technical problems or the decision to send staffers to safety, WWL-AM, a conservative talk-show format, was the only local radio station able to report on the havoc in New Orleans, thanks to its strong signal, an emergency studio in another location, and its own journalists on the scene.

WWL, owned by Pennsylvania-based Entercom Communications Corp., quickly abandoned its usual fare as residents, often unable to get through to 911, called the station instead. Program hosts became emergency advisers, helping panicked people plot escape routes and alerting authorities to their locations. By midweek, WWL found itself getting national attention from an interview New Orleans Mayor Ray Nagin gave to WWL host Garland Robinette. In a freewheeling 13-minute conversation, Mayor Nagin criticized the national response to the crisis and said President Bush and Louisiana Gov. Kathleen Blanco should "get their asses moving to New Orleans." He then broke down in tears and hung up. Television and radio stations across the country rebroadcast the interview, and the president flew to New Orleans the next day.

WWL's ability to continue broadcasting was vital for stranded listeners. Nekosha Bryant, 29 years old, ripped the radio and battery out of her car and tuned in as she waited on her roof for help. Imani Sutton, 34, threw her radio into a supermarket cart and wheeled it, along with other supplies, to the convention center, where she and her family listened around the clock. "That's all the information we have," she said.

One woman called to ask how to get six children out of her house when water was almost at her neck. The hosts told her to tear down a door, load the kids onto it and float them to the roof. Their fate is unknown. "You just feel helpless, because you give people advice, and locations, and you don't know if they got rescued or not," said Ms. Newman.



On Thursday evening, a woman called the station from Algiers in Orleans Parish. Her 8-year-old daughter had just finished their last bottle of water, and they had no electricity. Distraught, she asked the hosts how to get to Houston. They told her to wait until daybreak, and then walk to a town called Gretna, in Jefferson Parish, and take shelter in a high school.

After a commercial break, the announcer's first call was from Jefferson Parish's president, Aaron Bouchard, who said he had closed his borders to incoming traffic, even pedestrians. "Jefferson Parish is no promised land," he said. "There is better food and better supplies in New Orleans. We don't even have the Red Cross here." He suggested the woman walk to the nearest police station and get a ride to the Superdome.



Meanwhile, the station itself was scrambling to stay on the air. On Tuesday, water from a broken floodwall lapped at the lower stories of the station's downtown headquarters, threatening its operations.

Programming director Diane Newman and other staffers reacted quickly: The station alternated broadcasts between its downtown office and its small emergency studio located in a local government building in a part of nearby Jefferson Parish that wasn't flooded. WWL has used this makeshift station during past hurricanes. The station was able to broadcast on

three of Entercom's six signals in New Orleans -- if one signal went dark for a while, listeners could find the program by switching to another Entercom signal on the dial. Most other local stations -- which mainly play music and lacked the resources for extensive news reporting downtown -- don't have as many signals as Entercom in New Orleans and don't maintain emergency studios.

Later in the week, WWL expanded its reach by cutting an unusual deal with rival Clear Channel Communications Inc. In a joint venture dubbed United Radio Broadcasters, the two companies share staff and studio facilities.

WWL was also busy trying to save its own staff from the station's downtown studios. During the hurricane itself, WWL news director Dave Cohen and two other staffers broadcast from the emergency studio, alternating with colleagues at the downtown site, which was stocked with food and powered with a generator that provided air conditioning. But after the flooding began last Tuesday, it looked like Mr. Cohen and his team would have to take over all the programming, as staff members evacuated WWL's main headquarters. Several dozen people -- including family members of staffers and their pets -- had gathered there to ride the storm out. Some, like Ms. Newman, made it out by car.

A few others were shuttled out by a helicopter chartered by Dick Lewis, the regional director for Clear Channel, which was trying to rescue one of its own employees. By Thursday evening, a bus accompanied by three armed guards and two sheriffs picked up the last staffers at the Entercom offices downtown.

On the business side, Entercom's national news and talk programming director, Ken Beck, and his counterpart at Clear Channel, Gabe Hobbs, were trying to come up with ways the two broadcasters could help each other.

Mr. Beck offered Entercom's New Orleans programming to Clear Channel, which, with only sports and music stations in New Orleans, didn't have the same news resources as Entercom. But Mr. Hobbs came back with a better offer: the two groups would share staff and resources and serve the hurricane-stricken area jointly out of Clear Channel offices in Baton Rouge, La., about 75 miles away. Entercom jumped at the opportunity and began directing its displaced New Orleans staff there.

"It was a little weird having conference calls between our company programming and engineering staff and exchanging information that not long ago you wouldn't have dreamed of sharing with a competitor," says Mr. Hobbs. The shared arrangement even included temporary living quarters -- relocated Clear Channel and Entercom staff are



bunking in recreational vehicles parked behind the Clear Channel building in Baton Rouge.

Both companies have had problems with transmission and transmitters, but the united broadcast continues to operate. Clear Channel trucked in fuel for its transmitters' generators from Florida, where the company keeps gas and diesel stockpiled because of the frequent hurricanes there. Entercom said the WWL transmitter has enough fuel for a month.

Now, most of the WWL staff have reassembled in Baton Rouge, where they are expected to remain for months, even if the joint on-air

Broadcasts don't last beyond a few weeks. Entercom and Clear Channel hosts are on the air together, talking to local officials and fielding calls from listeners, many of whom are still tracking down relatives, looking for supplies and wondering when electricity will be restored.

Financial details will be worked out later. "We have a handshake agreement on this," says Mr. Lewis of Clear Channel. "No one has said, 'Count the money.' Everyone has said, 'Get the best quality information out there you can.' "

**The
Washington
Post**

IN KATRINA'S WAKE : Scenes From The Disaster Area

September 8

A Cajun Party With a Purpose

Even in the most disastrous of times, Cajuns know how to party.

"We're asking people to bring rice and onions over here to make some jambalaya."

"And beans. They need some red beans." "Propane burners, too. Gotta bring over some supplies."

A few days after the most devastation these tough southern Louisiana residents have ever seen, The Rajun' Cajun radio station had this latest request. The folks at Grande Isle, a

small slip of land that ended up underwater, needed something hot to eat as they returned to their property. That very evening, the makeshift emergency center was filling up with jambalaya supplies.

The Rajun' Cajun radio station has been on air during and since the hurricane. But it hasn't been playing much of its all-Cajun-all-the-time music. It is acting as a go-between for everyone who needs everything.

"How many kids are at the Civic Center?" a woman caller asked. "Because I've got 100 Beanie Babies I been collecting."

"You bring 100 Beanie Babies over there, you get 100 smiles," said Captain Kirk, who typically is host of "Talk of the Bayou."

In a land of leaning and splintered telephone poles, shrimp boats tossed along bayou banks like toys, and houses, trailers and houseboats just decimated, the radio station has been this self-sufficient area's link between those who have and those who need. The station opened its warehouse immediately after the hurricane to let people drop off food, water and supplies. It has been filled and refilled. Walk into the entrance, and volunteers are taking a sweaty break on two recliners ready for a dry new home. A virtual grocery store is lined with families, many picking up disinfectant and other cleaning supplies. Large men in sleeveless T-shirts are outside grilling sausage, with a side of sausage for anyone who walks by. And Connie Callais, a retired teacher whose home is without power, has containers of hot rice and beans for anyone who wants them.



"This is the generosity of Cajuns," Callais said arms wide as she took in the stocked warehouse.

Sarasota Herald-Tribune (Florida), September 12:
Stations unite to keep information flowing after Katrina

By Dawn E. Scire

As folks familiar with hurricanes Charley, Frances, Ivan and Jeanne can attest, the destructive fury of a storm can wreck communications systems, including those of hospitals, police and fire stations, shelters and other emergency centers. Such was the case with Hurricane Katrina.

Kenneth Moran, director of the Federal Communication Commission's Office of Homeland Security, reported that almost 100 television stations were off the air as of this

writing (although that may not be a pressing issue for people without electricity -- or homes), and at least 160 radio stations were affected in the storm-damaged region.

Moran said only four of New Orleans' 44 area radio stations functioned during the storm.

Unprecedented unification -- Entercom's WWL 870 AM in New Orleans played the role that Punta Gorda's "Kix Country" (WIKX 92.9 FM) did in last year's storm disorientation: Reporting from inside the storm, guiding frightened callers, listening to people's stories and attempting whatever help they could.



WWL switched between three frequencies whenever one got knocked off the air until the near-underwater downtown studio finally stayed dark and an emergency site farther inland took over.

Entercom's downtown employees got trapped by rising water but were rescued by Clear Channel's regional director, Dick Lewis, who flew a chartered chopper to save one of his company's trapped DJs.

Afterward, the two companies worked out an unheard-of deal to share resources, broadcasting together as United Radio Broadcasters of New Orleans, and became coordination central, as it were, for area survivors and volunteers.

Independent stations KLCK 1470 AM in Lake Charles and KJEF 1290 AM in Jennings have also joined, and now provide the primary frequencies for the single transmission that combines 15 stations' resources.

United Radio Broadcasters set up a toll-free phone number for people to call in reports, news and stories, and most importantly, to synchronize help, and has extended invitations for other stations to carry the broadcast after becoming operational.

One other -- GHB Broadcasting's WTIX 690 AM also survived the hurricane within New Orleans.

It was able to transmit until 8:15 a.m. Aug. 29, when the water began flooding the city; however, its phones remained intact until Tuesday afternoon. Staffers continued to assist panicked residents despite the station's power loss -- and even during one stint when WWL lost its phone service.

The five employees were evacuated that day and are now safe in a Houston hotel.

Speed and donations -- Moran reported that given the horrendous damage, his office is expediting all stations' paperwork to aid their return to functionality (his office even stayed open through Labor Day weekend).



The FCC and Federal Emergency Management Agency coordinated to donate TVs to the shelters (now called "disaster relief facilities") and set up national emergency services programming through Direct Broadcast Satellite channels.

The National Association of Broadcasters teamed with the Salvation Army and the American Red Cross to distribute 10,000

small battery-operated radios to storm survivors.

The NAB also partnered with Mississippi and Louisiana broadcasters to distribute 1,300 battery-powered, handheld TVs (with AM/FM capacity) for state police and public-safety coordinators.

Mediaweek, August 31:

Local Media Outlets Struggle to Carry On Post Katrina

By Katy Bachman and Tony Sanders, Billboard Radio Monitor

For local broadcasters trying to stay on the air amid the devastation left by Katrina, it's practically minute by minute as the situation continues to change. For the most part, even though WWL-TV, Belo's CBS affiliate in New Orleans managed to stay on the air after moving its operations to Baton Rouge on Sunday, the public is largely relying on battery-operated radios. Those stations that are up and running in the affected areas are running wall-to-wall coverage with no commercials, a situation advertisers and agencies are tracking daily.

WWL-AM, the 50,000-watt Talk station in New Orleans owned by Entercom Communications, came back on the air late Monday after it was knocked off the air Monday when the city's levees broke down. As the situation deteriorated, Entercom authorities said they would shut down two of their four stations, keeping WWL and WLMG-FM up and running. To do that, Entercom is evacuating its staff from downtown New Orleans and setting up a new site in Baton Rouge.

In the spirit of cooperation, Clear Channel has been lending its helicopter to Entercom to help the station evacuate. Clear Channel is operating KHEV-FM, its Gospel station in New Orleans, which is currently simulcasting coverage from WWL-TV. Other CC stations will originate coverage from Baton Rouge. WVUE-TV, Emmis Communications' Fox affiliate, while off the air, has volunteered its TV anchors to help CC with coverage. In Biloxi and Gulfport, Miss., CC has two radio stations back on the

air on Tuesday, which Gabe Hobbs, vp of News/Talk programming for CC said was a “miracle.” The stations are using portable studios, portable transmitters on trucks, heading for remote staging areas in Atlanta and Tallahassee to stay on the air.

Most TV station owners have no idea when they will be able to get local stations up and running over-the-air because assessing the damage is near to impossible. Both Tribune stations in New Orleans (ABC affiliate WGNO and WB affiliate WNOL) remain off the air, relying on web sites to deliver messages to the public and to its employees.

WDSU, Hearst-Argyle Television’s NBC affiliate in New Orleans had to evacuate its studios, so sister station WESH-TV in Orlando provided much-needed coverage for the market during the hurricane. WESH also stepped in to produce WDSU’s web site. Many WDSU anchors and staffers moved to another sister station, WAPT-TV in Jackson, Miss., which is also stepping in to help produce WDSU’s web broadcasts.



When normal over-the-air broadcasts will resume is anybody’s guess right now.

Across the network of Internet Broadcasting System’s network of 70 local TV stations, (which includes the Hearst-Argyle stations), page view traffic has increased 140 percent with a one-day record of 38 million page views. WDSU, which is streaming live on its site (WDSU.com) experienced a 2,200 percent increase in daily page views with 4.1 million page views versus a month-to-date average of 187,000 and a 100,000 increase in live streaming views. Meanwhile, the AP is reporting that The Times-Picayune of New Orleans evacuated its offices Tuesday and is now posting updates on its Web site NOLA.com, as is The Sun Herald of Gulfport, Miss., another city that was pounded by the storm. The Sun’s site, SunHerald.com’s banner headline simply reads “Devastation.”

Inside Radio, August 30:

Call ’em crazy, call ’em heroes — they kept radio going during Hurricane Katrina.

by Scott Fybush...

Hurricane Katrina – Radio’s (and TV’s) reaction: The pictures from Louisiana and Mississippi have been gripping. And the broadcasters down there have, understandably, been worrying more about their own safety and about providing emergency information to their own audiences than about keeping the rest of us posted on their status. But here’s what Inside Radio/M Street Journal has been able to piece together:

The big gun falls silent – We’re sure AM radios all over much of the nation were tuned to Entercom’s WWL, New Orleans (870) Sunday night for its comprehensive storm coverage. The 50 kw blowtorch moved staffers away from the outside of its fifth-floor studios in New Orleans’ Central Business District as the storm neared, and eventually

moved its studio base to its emergency studios at the Jefferson Parish emergency operations center. But WWL's transmitter sits in a vulnerable location, outside the levees about five miles south of New Orleans. And even though it's a hardened site, with both towers and the transmitter building high atop concrete pylons, the storm was still too much, taking 870 silent at 12:44 AM central time. Coverage continued on and off via Entercom's five FMs and a second AM, WSMB (1350), and we're told that WWL was back on the air at low power Monday morning. We're still awaiting word on the status of the 50 kw site off Barataria Boulevard.



Clear Channel to Baton Rouge – The two AMs and five FMs in the Clear Channel New Orleans cluster evacuated their staffers as the storm drew near, and those signals were carrying emergency programming from CC's WJBO, Baton Rouge (1150) for as long as they were able to stay on the air. (Sketchy reports from New Orleans indicate that most of the market's FMs went silent at the height of the storm.)

Elsewhere on the dial – DXers reported hearing strong signals overnight from locally owned WTIX, New Orleans (690) and from Communicom's religious WLNO, New Orleans (1060); the latter reportedly stayed with its paid preaching programs even as the storm swirled around it.

For New Orleans TV – it's not just "Plan B" – they're up to "Plan J" or thereabouts: Belo's WWL-TV (Channel 4) and Hearst-Argyle's WDSU (Channel 6) had their coverage in high gear Sunday, providing evacuation information and weather updates in advance of Katrina. As the storm closed in on land, both stations sent staffers out of the city to emergency studios away from the center of the action. WWL-TV decamped to Louisiana State University in Baton Rouge, where it took over the student production facilities for its coverage, while WDSU sent its staff to sister station WAPT (Channel 16) in Jackson, Mississippi (and, for a few hours, carried some coverage from another sister station, WESH in Orlando.)

The key to "Plan J" – the Web: Knowing that their transmitters were in danger of flooding and power loss, and that much of their viewing audience had fled New Orleans, both WWL-TV and WDSU turned to Webcasts to get their programming out. On Monday afternoon, WDSU's anchors (on a makeshift set in Jackson at WAPT) reported that the on-air signal for WDSU was suffering frequent outages, advising viewers to use the Web version of the signal if at all possible. Smart strategy.

(As for New Orleans' other TV stations: Tribune's WGNO had to make an early exit from its studios on an upper floor of the World Trade Center high-rise along the river, leaving that signal simulcasting Baton Rouge ABC affiliate WBRZ. And we're still awaiting word on the fate of Emmis' Fox affiliate, WVUE, whose tower-cam was

feeding the Weather Channel until about midnight, Central time, Sunday.)

Beyond New Orleans – The unexpected eastward turn of Katrina's path must have caused some nervous moments in Mobile, where they're still recovering from Hurricane Ivan. That storm took down the 1800-foot tower of Clear Channel's WPMI-TV (Channel 15), which just finished rebuilding. The new tower's still standing, but the station reports that a lightning strike took it off the air. (It's supplying programming to several area radio stations.) In Biloxi, WLOX-TV (Channel 13) had to abandon its studios after the roof came off, depositing a foot of water in the building. We're still awaiting word (as of Monday afternoon) on the radio operations along the Gulf Coast.



What's next – emergency recovery and a lot of work: Several broadcast groups are already rushing people and supplies to the area, getting in place to begin rebuilding as soon as they can get access to the sites that were worst hit. Clear Channel moved its emergency facility, including a frequency-agile transmitter, closer to New Orleans in the hours before the storm. Cumulus was also making arrangements to get engineers into the area on Monday. And Belo was sending relief crews from newsrooms as far afield as KTVK, Phoenix to help the staff at WWL-TV cover the aftermath.

We're sure there will be many more stories that will come out as the waters recede and the rebuilding gets underway. We'll be updating insiderradio.com and mstreetjournal.com as we learn more. (And send us your stories, too!)

Clear Channel, Radio-Station Owners Form Emergency Broadcast Network, PR Newswire-September 1:

Clear Channel Communications, Inc., Entercom Communications Corp. and two independently owned radio stations have formed a new broadcast group to United Radio Broadcasters of New Orleans is comprised of 15 radio stations that have combined their programming and engineering resources to assist in the Hurricane Katrina relief effort.

San Antonio-based Clear Channel owns seven radio stations in New Orleans. Entercom in Pennsylvania owns six radio stations in the city, including New Orleans' leading news station WWL-AM 870. Independently owned stations 1470 KLCL in Lake Charles and 1290 KJEF in Jennings round out the 15. The stations are all running full coverage of the evacuation and relief efforts. The stations also set up a toll-free number whereby listeners can call in with their questions and comments.

"Given the state of New Orleans, we believe it is critical for the community to have the most current and accurate information available," Clear Channel Radio President and CEO John Hogan says. "Radio is best positioned to provide this service and by coming

together and pooling our resources we will be able to provide the community with news, updates and a connection with the outside world."



***USA Today September 1:
Gulf Coast Residents Tell Their Stories
Live On The Web
from Mark Memmott....***

Because so many people had evacuated New Orleans and other cities along the Gulf Coast, and because power was out in so many places, most of the hurricane-related traffic to blogs and Web sites came from outside that region, said Dave Sifry, CEO of Technorati. He estimated that the number of postings and searches involving blogs was up 20% to 30% Monday, compared to an average weekday. **Still, he said, for people inside the hardest- hit areas, a battery-powered radio was probably the best tool for getting news. "The greater the**

emergency, the lower the technology gets for staying in touch," Sifry said.

Broadcasting & Cable, September 5:

Weathering the Storm:

TV News Operations Face Enormous Obstacles in Delivering Critical News

by Allison Romano

As anchors at WLOX, the ABC affiliate in Biloxi, Miss., delivered the news live on Hurricane Katrina on Aug. 29, they felt the power of the storm like few others in the media: Winds suddenly ripped the roof off parts of the building.

A foot of rain washed into the hole in the section of roof covering the newsroom. Staffers fled to the second floor and a small studio. Running on generator power, the station managed to continue live coverage, while its Internet access and phone service were cut off. One satellite phone connected the station to the outside.

"It became a struggle between them and the hurricane," says Jim Keelor, president of WLOX parent Liberty Corp. "It won for a while, but we're starting to win now." Amid one of the largest natural disasters in U.S. history, with several hundred estimated dead in four states and more than 2 million people without electricity, food or water, getting the news out to viewers last week was critical. It was also harder than ever.

Three of the four New Orleans news stations were unable to broadcast, while one Mobile, Ala., outlet was temporarily knocked off the air. Cox Cable and Charter Communications, the region's major cable systems, lost service to hundreds of thousands

of subscribers. Network news crews were frustrated trying to navigate an unfamiliar region with spotty communications. And already the storm has altered Nielsen ratings in at least four markets for the foreseeable future.



In Biloxi, WLOX will need to rebuild its facility and replace two regional bureaus that were wiped out. For the rest of the area, the cost of the cleanup and relocation of storm refugees is impossible to pinpoint, but local media companies are certain to spend tens of millions of dollars digging out (see Money Talks, page 10). Aside from such costs, the storm leaves sobering lessons for stations and cable operators across the U.S. about planning for such events as natural disaster or terrorism.

As the disaster continues to unfold, the Internet (and radio) are proving to be crucial sources of information. Bloggers are trading images and updates to info-starved surfers. But what has become quickly apparent is that only the graphic images of television can convey the scope and devastation of such a catastrophe.

No one has told the stories better than local TV reporters, many of whom lost their homes and brought their hometown expertise to the hurricane coverage. In New Orleans in particular, reporters have been bracing for years for such a catastrophic storm to overwhelm the levee system, which eventually broke and flooded the city. “The national media didn’t understand the gravity of it,” says David Bernard, former meteorologist for WWL New Orleans and now at WFOR Miami, who raced back to report from his former hometown. “We knew what the consequences would be.”

Stations on the Gulf Coast have been tested by damaging storms recently, notably Hurricane Ivan last year and Dennis in July. In those cases, local outlets lost power but still managed to broadcast days of wall-to-wall coverage. Despite the best preparations, Hurricane Katrina proved devastating. New Orleans stations were forced to evacuate to sister stations. A few that stayed behind narrowly escaped being trapped. Helicopters plucked several WDSU employees off a hotel roof, and KTLA Los Angeles technology reporter Kurt Knutsson, in town working on another story, also evacuated. A skeleton crew at WWL was forced out as water started seeping into the building.

Based on experience, local media found ways to keep going. WWL, the top-rated local news station, resorted to broadcasting from student TV studios at Louisiana State University in nearby Baton Rouge and from a small emergency outfit at its transmitter site. Remarkably, even as 135-mile-per-hour winds lashed the Big Easy, WWL never lost its signal. Three years ago, when the station built a new tower, it selected a higher point

in New Orleans, in part to keep its equipment safe in case of such a disaster. There is no telling when the station will be able to get back into its French Quarter headquarters.

“This one is going to be longer, harder and tougher than what anyone anticipated,” says Jack Sander, president of media operations for WWL parent Belo.

WWL is Belo’s only station in the area, but other broadcast groups were harder hit. Liberty Corp., Hearst-Argyle, Emmis and Tribune own two stations each in the region. Their New Orleans affiliates suffered severe damage: Hearst-Argyle-owned NBC affiliate WDSU, Emmis’ Fox station WVUE, and Tribune’s ABC outlet WGNO and WB affiliate WNOL were all knocked off the air and their staffers were evacuated.

Several parent companies, including Media General and Tribune Broadcasting, are using RVs to house crews in the field. Even the best preparations were sometimes futile. In Mobile, WPMI fired up its generator when the power failed but was knocked off the air when lightning struck the generator. For a day, the Clear Channel-owned station reported via its sister radio stations until a new generator arrived and TV broadcasts were resumed.

“The roughest situation ever seen”

Those companies—and the national networks—have ferried in extra producers, satellite trucks and supplies, in several cases by charter plane. In the hardest hit locations, crews



have only satellite phones and sporadic Blackberry service for communicating, and limited food, water and fuel. Helicopters from as far away as San Antonio are on the scene supplying pictures. WLOX had no way to update its Web site, so producers at the Liberty station in Louisville, Ky., took over postings. Hearst-Argyle’s WESH Orlando, Fla., and WAPT Jackson, Miss., helped WDSU stream live coverage and update its Web site. “We all get credit for helping to evacuate the market and keep casualties even lower,” says Hearst-Argyle Senior VP of News Fred Young, “but this is the roughest situation anyone’s ever seen.”

Even if viewers in affected areas can eventually watch TV to get news, no one is monitoring the audience levels. Nielsen Media Research is not reporting ratings from set-top meters in New Orleans and Birmingham, Ala., because of power outages. New Orleans may not be restored for months, the ratings firm says.

New Orleans ranks as the 43rd-largest U.S. market and accounts for 675,760 TV homes. Combine that with three other affected markets in the region, and more than 1.1 million TV households have been impacted, which represents about a full rating point nationally. After last year's hurricanes in Florida, Nielsen had to recruit new participants and will likely face the same problem in these Gulf Coast markets.

Without a traditional TV audience, news organizations resorted to new and old technology to get the news out. Radio stations in each market have simulcast the TV coverage, enabling residents with battery-powered radios to listen to local TV news. Several stations have been streaming their broadcasts live online and blogging.

In some cases, local news went far beyond usual boundaries. WJTV, the CBS affiliate in Jackson, Miss., streamed its coverage live to a global audience. "We've heard from soldiers in Iraq who are Mississippi reservists watching our Webcasts and a woman in Peru whose sister lives in Madison, Miss.," says News Director Rick Russell.

Web traffic soared for national and local sites. CNN and MSNBC recorded about 9 million video plays in one day, records for each. On Aug. 30, WWL recorded more traffic on its Web site than it averages for an entire month. In Mobile, WPMI anchor Scott Walker has been blogging the storm and says his blog recorded more than 2,500 hits, versus his usual 100 daily hits.

Across the region, national TV crews are working under equally trying conditions.

"It looks like a war zone," says Jeff Raineri, a meteorologist for NBC's local weather service Weather Plus, reporting from Biloxi for NBC News. "Brick homes were blown away, and casinos floating in the water were carried hundreds of feet inland."



CNN's Anderson Cooper, stationed in Mississippi and Louisiana last week, says the devastation surpassed any hurricane he had covered: "It compares to the tsunami in Sri Lanka and some of the things I saw in Sarajevo during the [Balkans] war. It is not a reference point that the U.S. has seen before."

The images out of New Orleans seemed surreal even to jaded TV news reporters. In New Orleans, gunfire and fights broke out at the Superdome, where thousands of refugees baked in the heat. Looting and random gunfire created a lawless environment. Some news crews traveled with armed guards; others abandoned scenes that got too dangerous.

“Apart from 9/11, this is one of the most astounding events ever to hit our country,” said CNN’s Jeanne Meserve, who described seeing bodies floating through the streets and dogs wrapped in electrical cords. NBC’s Martin Savidge tried to convey the desperation in the Superdome: “The air has gone bad, the toilets are overflowing, tensions are rising among rival gang members inside,” he said. “Things are so bad, state officials are now evacuating the evacuees.”

Some of the biggest network stars raced to the scene. Brian Williams anchored *The NBC Nightly News* from New Orleans. ABC News’ Elizabeth Vargas was part of the network’s large contingent and anchored *World News Tonight* from battered Gulfport, Miss. CBS News dispatched John Roberts and Harry Smith to the region.



“This story is getting bigger and bigger,” says Marcy McGinnis, CBS senior VP of newsgathering. TV news outlets say they are prepared to have crews in place for weeks, if not months.

Maintaining exhaustive coverage will surely stress budgets at stations and national media. The aftermath of Hurricane Katrina resembles coverage for a war or after 9/11. News organizations will have to rotate in crews from bureaus—and even stations in other states—to pitch in, stressing already stretched news budgets. Salvaging damaged equipment and buildings will take time and cost millions of dollars. Affected cable operators face lost revenue from displaced subscribers.

But viewers are hungry for the information. Ratings for cable coverage and network news specials have surged. The Weather Channel tripled its usual audience, averaging more than 1 million viewers in prime on nights after the storm. CNN, Fox News and MSNBC’s audience swelled. For the first time in a while, CNN came close to matching Fox News’ ratings in the key 25-54 demographic, according to Nielsen data. Prime time specials on ABC, CBS and NBC attracted better ratings than a typical edition.

Almost everyone agrees it will be months before life returns to normal. Some station employees learned that they had lost their homes from aerial coverage. When Bill Flowers, who owns a traffic-reporting service in Mobile, went up in his plane the day after the storm, his friend, local Fox anchor John Edd Thompson, asked Flowers to check out the damage to his coastal home. He brought the footage to the station and showed it live. Thompson cried.

Some reports from local stations on operations – given to NAB:

WWL-TV New Orleans except for a few hours Monday night, has provided continuous coverage, initially from New Orleans, then broadcast from LSU in Baton Rouge. They anticipated moving PBS station KLPB in Baton Rouge and to continue broadcasting.

Baton Rouge WAFB-TV powered up and running, been providing coverage 24/7, never went off the air and running off generators.

Hattiesburg: WDAM-TV same situation, never off air, suffered some damage to building, running off generators. Raycom is sending provisions of food and water, toilet paper to station via truck tonight, along with a satellite phone.

WWL-AM New Orleans lost signal Monday morning (8/29). Crew waded through "alligator infested flood waters" to get the signal back up and running. They had to abandon their studio and continue bosting from Jefferson Parrish Emergency Operations center. (9/2)

WWL Update: The following stations were carrying WWL across the country as of (9/7)

KAMU	College Station, Texas
KEYC	Mankato, Minnesota
KFDM	Beaumont, Texas
KJTV	Lubbock, Texas
KSTP	Minneapolis / St. Paul, Minnesota
KTBS	Shreveport, Louisiana
KTVX	Salt Lake City, Utah
PBS Louisiana	Louisiana (Statewide)
WBMA	Birmingham, Alabama
WBOC	Eastern Shore of Delaware, Maryland and Virginia
WCIU	Chicago, Illinois
WDIV	Detroit, Michigan
WDWB	Detroit, Michigan
WFSB	Hartford / New Haven, Connecticut
WHDH	Boston, Massachusetts
WJHG	Panama City, Florida
WKMG	Orlando, Florida
WPEC	West Palm Beach, Florida
WPLG	Miami, Florida
WQOW	La Crosse / Eau Claire, Wisconsin
WRGB	Albany, New York
WSHM	Springfield / Holyoke, Massachusetts
WSIL	Paducah / Cape Girardeau / Harrisburg, Illinois
WTVH	Syracuse, New York
WTVR	Richmond, Virginia
WVEC	Norfolk, Virginia
WVNS	Beckley / Bluefield / Oak Hill, West Virginia
WWSB	Sarasota, Florida

WXXI

Rochester, New York

WDSU-TV New Orleans has provided wall-to-wall coverage since the Saturday morning before the storm hit. We have never stopped, even after our transmitter was flooded, streaming on wdsu.com 24/7. We have been back on the air in N.O. for several days on Pax 49 and are now on the air in Houston on the Pax station there, also channel 49. We are back in our building in N.O., which was not damaged, and using our studio.

We are maintaining our broadcast through the facilities of WAPT in Jackson and WESH in Orlando and have crews on the ground and in the air throughout the N.O. area and in BR and Houston. This is a company-wide effort for Hearst-Argyle, involving personnel from all of our stations around the country.

Update on Broadcasters' Help with Hurricane Katrina Relief

Most of the following reports were filed by stations prior to September 9, 2005, which was designated Broadcast Unity Day. Many stations have not reported their various fundraising totals to date. In addition, totals from Unity Day are now being compiled by relief organizations.



WPEC-TV West Palm Beach On-air fundraising campaign Thursday 9/1 raised \$94,330 for Red Cross as of 11:00 p.m. 4:00-5:00pm simulcast on **WPEC NEWS 12** and **WFLX** Fox 29 5:00-6:30pm and 7:00-8:00pm on WPEC NEWS 12; 10:00-11:00pm on WFLX Fox 29.

WFAA-TV and The Dallas Morning News organize local "Spirit of Texas Hurricane Relief Fund" for victims of Hurricane Katrina. In addition to WFAA,

The Dallas Morning News and **WBAP**. **Belo** television stations throughout Texas are also participating in this relief effort, including **KHOU** (Houston), **KENS** (San Antonio) and **KVUE** (Austin). A special account has been established to accept donations.

KZLA-FM/Los Angeles is asking listeners to donate bottled water, pre-packaged foods, diapers and baby food/formula. Station staff will be driving an 18-wheeler Saturday, Sept. 10th from Los Angeles to Louisiana to drop off necessities to victims of Hurricane Katrina. KZLA will be asking for donations of bottled water, non-perishable food, diapers and baby food/formula next Friday, September 9th at Keyes Toyota in Van Nuys from 6am-7pm! The very next day, KZLA will load the truck and drive from "L.A. to LA" to unload the truck full of donations to the needy in Louisiana. KZLA is urging its listeners to donate these items to those in desperate need!

Entercom KIRO-AM/Seattle is raising funds with a four-hour radiothon on Friday (9/2) live from outside Qwest Center accepting cash donations for Northwest Medical Teams in person and by phone. KIRO's Dave Ross and Dori Monson joined forces and hosted a four-hour radiothon last Friday and raised \$126,070.46 for victims of Hurricane Katrina. All donations will be given directly to Northwest Medical Teams, which partners with other major US relief organizations to coordinate response efforts in disaster situations. For more information about Northwest Medical Teams, log onto www.nwmedicalteams.org.



WFMZ-TV Allentown, an independent station in the Philadelphia market, raised \$126,000 dollars for the Red Cross relief efforts in six hours on September 1. The money came from viewers calling into the WFMZ-TV phone bank manned by 25 volunteer operators. In addition to the money raised on the phone, \$8,000 was received via the Internet. People are continuing to drop off donations to the station.

The **Alabama Broadcasters Association** announced September 13 that radio and television stations across the state topped their goal by collecting over three million dollars between September 2 and September 11 under their "Two Million in Ten Days" campaign. The campaign partnered the Association's membership with the American Red Cross to raise money for coastal areas affected by Hurricane Katrina.

For ten days, radio and television stations across the state conducted specific events and on-air campaigns asking for donations to the American Red Cross Disaster Relief Fund. "Stations are still counting the collections but, as of yesterday (9/12) most had reported in with a total of \$3,219,973.44," said Sharon Tinsley, Executive Director of the Alabama Broadcasters Association.



KIRO-TV Seattle broadcast "Hurricane Katrina: The Northwest Responds" 30-minute news Special on September 5, 2005 at 8 PM in conjunction with the *KIRO 7 Katrina Relief Fund*.

NAB announced plans to work with the industry to raise \$100 million in cash donations for relief efforts. "BroadcastUnity for Katrina Relief," includes a \$1 million cash donation from the NAB to the American Red Cross. NAB is designating September 9th as "BroadcastUnity Day," asking all stations on that day to dedicate a minimum of 60-

seconds each hour to the relief effort. New, Katrina-specific radio and TV PSAs will be available at www.nab.org or by e-mailing sroberts@nab.org. NAB requests that each station air the PSAs at the top of each hour.

NAB partnered with the Louisiana and Mississippi state broadcast associations to distribute 1,300 battery-operated handheld television sets to public safety officials assisting with Hurricane Katrina relief efforts. The five-inch analog TVs, purchased by the NAB from St. Louis-based GPX, were distributed among state police officials and other public safety organizations in Louisiana and Mississippi. Coordinating the distribution effort were the Louisiana Association of Broadcasters (LAB) and the Mississippi Association of Broadcasters (MAB). NAB also partnered with the Salvation Army and American Red Cross to distribute 10,000 battery-operated handheld radios to displaced residents.

KOIN-TV/Portland raised more than \$260,000 for the American Red Cross Disaster Relief Fund.



WESH-TV Orlando is joining Magic 107.7 FM and the Red Cross Friday for a daylong fundraising telethon. Beginning at 5 a.m. during WESH 2 News 2 Sunrise, and throughout the day during regularly scheduled WESH 2 News broadcasts, WESH-TV viewers will be invited to pledge financial contributions to the Red Cross. In addition

to regularly scheduled newscasts, two hour-long blocks of programming at 11 a.m. and 3 p.m. will be devoted to the WESH 2 Disaster Relief telethon.

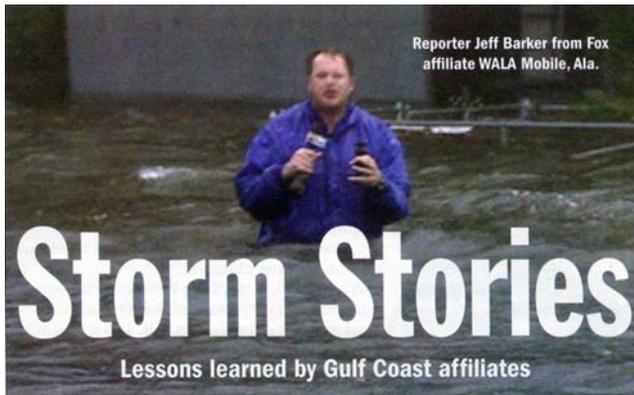
The **Oklahoma Association of Broadcasters** reported that for the first time ever, 13 Oklahoma City radio stations broadcast their morning shows from the same location, in order to raise funds for the Red Cross.

Emmis Communications sent two planes of supplies and personnel to Mobile to assist its employees. They found an extraordinary effort by **WALA** (Fox 10, Mobile) employees to not only deal with their own difficulties from Katrina but also to provide support to their **WVUE** (Fox 8, New Orleans) colleagues.

Emmis employees received an update on the situation and were notified that their contributions for Hurricane Relief to the Emmis Relief Fund would be matched dollar-for-dollar up to \$25,000 by the Smulyan Family Foundation. Below is a partial list of what other Emmis properties are doing to assist in relief efforts.

WKHM-AM and FM in Jackson, Michigan set out with the help of local trucking and warehouse companies to fill a 53 foot semi filled with hurricane relief aid materials like: Diapers, water, juice, baby food and toiletries. We encouraged Jackson County Residents and businesses to help us fill the truck. We had an overwhelming response. Through the generosity of Jackson County Residents and businesses we not only filled the one truck, but we filled 5 and have a 6th one in the works! All supplies are going to Alexandria Louisiana to directly help those in need.

WSOC-TV Charlotte, NC viewers donated \$145,000 in just nineteen hours to the local chapter of the American Red Cross to help with disaster relief. Phone bank at Channel 9 starting Tuesday, August 30 during Eyewitness News at 5:30 pm and stayed staffed



through Channel 9 Eyewitness News at 11 pm that night – process repeated on Wednesday until 11:35 pm, staffed mostly by station staff volunteers taking shifts.

The **Nevada Broadcasters Association** announced that it will make two significant donations -- one to Louisiana and one to Mississippi -- earmarked for small market broadcasters and standalone

stations. The NBA is joining together with other state broadcasters associations to provide this disaster relief to assist these broadcasters hardest hit by Katrina who do not have the financial resources and backing of major groups, those who without assistance, will be forced to shut down permanently.

KHOU-TV Channel 11 and Houston area Clear Channel radio stations raised \$6.3 million for the American Red Cross as part of “The Spirit of Texas Hurricane Relief Drive.” A phone bank was set up at the Channel 11 studios with volunteers answering phones and accepting pledges throughout the day and night.

KMTV (KM3)/Omaha Emmis Communications raised \$100,000 in cash in two days to benefit the American Red Cross Disaster Relief Fund.

Viacom announced is making a \$1 million cash contribution to the American Red Cross Disaster Relief Effort and is also instituting a worldwide employee matching gift program for employee donations.

WIBC-AM, WNOU-FM, WLHK-FM, WYXB-FM/Indianapolis are sponsoring a day-long Hurricane Relief Drive in downtown Indianapolis in front of Emmis'

headquarters today, Thursday Sept. 1. In addition to on-air personalities, American Red Cross volunteers will be on hand to accept donations. During this Saturday's annual SkyConcert, the Salvation Army will be stationed to accept cash donations for relief.

KGUN-TV/Tucson is participating in the Tucson Broadcasters Association effort for all media outlets to jointly raise money for the relief effort this Friday, Sept. 2. Most of the city's television and media outlets will be conducting "drive-thrus" and collecting money for the American Red Cross Disaster Relief effort. More than \$150,000 was raised.

Clear Channel radio and television stations across the country are airing PSAs directing listeners to www.StormAid.com. In addition, Clear Channel Entertainment is in the process of organizing benefit concerts and collection drives.

Cincinnati Seven-station Collaboration - Cincinnati stations unprecedented cooperative effort in answering the call for relief. General Managers, News Directors and Promotion Managers for all seven Cincinnati television stations agreed to produce a live, commercial free, 60-minute simulcast for all seven stations on Friday night, September 2, 7:00-8:00PM, preempting all regular programming, asking for donations for the American Red Cross. Simulcast will originate from WCET-TV, with phone bank of fifty volunteers from the seven stations. This is the first time that all seven stations have come together to produce a unified front in the production of a program.



Syndicated talk host Ed Schultz is opening his home to the victims of Hurricane Katrina through his "Adopt a Family of Hurricane Katrina" effort.

Salem's Los Angeles cluster is working with Feed The Children to help victims raising money through Labor Day with on-air appeals on Talk **KRLA-A**, Religion **KKLA**, and Contemporary Christian **KFSH** /Los Angeles and **KTIE-A**/San Bernardino.

Syndicated Kidd Kraddick In The Morning raised over \$270,147 in one day for relief efforts. Morning team is also offering affected affiliates studio space if they need it.

KSBJ/Houston announced a nationwide campaign to all Christian stations to gather retail and food gift cards.

Citadel Country **WKDF/Nashville** is auctioning off wide array of celebrity items.

Clear Channel **WFLA-A/Tampa** is selling 97-cent-a-gallon regular gas while taking donations for the American Red Cross at a MOBIL station. Drivers are being asked to donate the difference between the discount price and regular price to the relief fund.

Jefferson Pilot **KYGO/Denver** Gulf Coast Relief Campaign for the Red Cross says anyone who donates money will receive Mardi Gras beads to remember those affected by the storm. KYGO and the local Fox affiliate will be on site with Red Cross (9/2) at the Fox offices.

Sunshine Broadcasting **WHHZ**/Gainesville-Ocala, FL is collecting premium or autographed items for "The Buzz Telethon And Silent Auction" on September 9 for Red Cross.

Sports Radio **WEEL** Boston will collect donations for The American Red Cross Hurricane 2005 Relief at its Fenway Park studio for the remainder of the Boston Red Sox regular season home games and at the Patriots Pre-Game Party prior to the New England Patriots' opener tomorrow (September 8th). To make a donation online, visit www.WEEL.com or www.RedCross.org

WLYJ, Jasper, AL (Joy Christian Radio); along with a local church, Hunter's Chapel Church in Jasper, has already delivered over \$12,000.00 (retail) worth of bottled water, gasoline / diesel, baby formula, diapers, canned goods, and a lot more to the Laurel MS area this past Saturday, Sept.3. We had a convoy of a 26foot (tall) refrigerated truck, plus 6 pick-up truck loads that made the trip. We plan to take another truck in days to come to parts of the MS Gulf Coast as needed and available.



WQSI-FM/WACQ-AM Tuskegee, AL fundraiser in cooperation with the American Red Cross and the Tallassee Chamber of Commerce began this morning (9/7/05) at 6AM. We have volunteers with buckets out on the street in front of our studios in Downtown Tallassee. At 10AM we had collected over \$19,000. We plan to continue collecting funds here until 4PM. At that time our local Red Cross representative, Mike Woodall, is going to take the funds to Lowe's in Montgomery where it will be matched by Lowe's.

Clear Channel **WHKF/Harrisburg** is hosting "Concert For A Cause" to help raise money and donations for the Red Cross (9/7).

Clear Channel **WDCG /Raleigh's** Bob & The Showgram morning show presents the "Bus To The Bayou" to help victims (9/2), with simultaneous live broadcasts from 3 LOWE'S FOODS locations. Each location will have multiple semi-truck trailers, staff and volunteers on-site. Bob Dumas will drive the goods to Mississippi.

Clear Channel **WLAN/Lancaster** will dump the format 9/5 to present the "Wlan American Red Cross Labor Day Pay For Play." Listeners who make a minimum \$20

donation will hear any song they want. Red Cross reps will man the phones Sister **WNCI/Columbus** will run the same campaign.

Citadel/**Chattanooga (WSKZ, WGOW, and WOGT) along with WRCB-TV** will be set up in the VELOCITY SPORTS parking lot to collect cases and flats of bottled drinking water and monetary donations.

Legend Communications **WRYV/Huntington/Gallipolis, Oh** is broadcasting all day from local BOB'S MARKET, collecting bottled water and cleaning supplies. All area BOB'S locations will continue to collect goods through September 9.

Clear Channel **WYYD/Roanoke-Lynchburg** started out to fill one tractor-trailer with bottled water and ended up filling five.

Tom Joyner has announced the creation of the BlackAmericaWeb.com Relief Fund. The organization, formed in association with his online community BlackAmericaWeb.com, *The Tom Joyner Morning Show* and parent company REACH Media, will assist people who are helping those displaced by Hurricane Katrina. Joyner has set up a scholarship fund with a target \$1 million.

Michigan Governor Jennifer M.Granholm called a meeting with the **Michigan Association of Broadcasters** and Michigan Association of Public Broadcasters early this afternoon to discuss what we could do collective for the relief efforts. A 3-4 hour statewide Radiothon will take place during morning drive on Friday 9/9/05 to raise funds for the Red Cross through a central phone number making it easy for citizens to contribute.



KABC-TV Los Angeles, along with sister radio stations went on air from 5 am – 7 pm and raised more than \$600,000 from viewers. On air messages continue through the next week.

KPKX Phoenix teamed up with local ABC affiliate, ABC15, and Fry's Food to raise money at all Fry's Food stores and joining ABC15 for a

live broadcast from the Fry's location @ 90th Street and Via Linda in Scottsdale 9/2 from 3- 7 pm. Station is doing all request weekend for donation to Red Cross. 3. Station started selling our PEAK Relief Bracelets for a donation to the Red Cross Hurricane Relief, so every remote, appearance or van stop we have moving forward, we will be selling the

bracelets. PEAK Rock Art Show and Sale...a free exhibit showcasing the multi-talents of rock musicians, singers and songwriters opens Friday, September 9th through the 11th. Admission to the Show is free to the public and all works are available to purchase with a portion of the proceeds going to PEAK RELIEF for the Red Cross Hurricane Relief.



WMAR-TV ABC2 is doing the following:

- Studio drop-off point for donations to be forwarded to the Red Cross
- Studio blood drive
- Studio phone bank to help Red Cross with donations
- Partnership with local radio stations to push the WMAR studio blood drive and phone bank for donations

Jefferson-Pilot of Colorado radio stations **KYGO, KJCD, KQKS, KCKK** and **KKFN** began a fund drive "Beads for the Bayou" to run throughout the next few weeks at numerous events.

WBNS 10TV and the **Ohio News Network** Columbus, OH have launched statewide campaign, to help victims of Hurricane

Katrina. Through its partnership with Huntington Bank, and working with the Red Cross, they have established a *Show You Care Disaster Relief Fund*. News mentions and public service spots are currently airing encouraging donations at any Huntington Bank branch in Ohio.

WKRZ Radio near **Wilkes-Barre, PA** are jumping in to help the Red Cross Disaster Relief Fund. Anyone who donates through WKRZ can be secure that their money is going straight to American Red Cross. All the money the stations collects will be going to the Red Cross.

In response to strong demand for local hurricane coverage, **Belo** offered **WWL-TV** New Orleans' off-air signal to all broadcasters in non-Belo markets for broadcast on their digital multicast channel. This provides a key service to those interested in this incredible story.

WXRT Chicago's raising money for the Red Cross with Rolling Stones concert tickets (using the name "Gimme Shelter"). **WNKS**, Charlotte's Ace & TJ did a marathon "Give

to the Gulf" airshift to fill 10 tractor-trailer semis with supplies. And many Citadel clusters - hearing the pain of Citadel's New Orleans cluster - are doing "The Power of Five." That's a fundraising goal over 5 days of getting at least \$5 from "every man, woman and child in the area." Inside Radio - WXRT reports that their "Give 'Em Shelter!" fundraising effort to provide relief to those affected by Hurricane Katrina, has raised more than \$185,000. Last Wednesday and Thursday, XRT gave listeners who donate \$100 or more to the Hurricane Disaster Relief Fund of the American Red Cross the chance to win tickets to the Rolling Stones' sold-out concert at Soldier Field on September 10.

WMAR Baltimore is partnering with First Mariner Bank for drop off sites for money donations. People can drop off checks or money orders to the bank or the station and the funds will be forwarded to the American Red Cross. Funds can also be mailed to same.

KJRH Tulsa, OK has joined the Community Food Bank of Eastern Oklahoma for a special food drive.

From the West Coast comes word that **KABC Los Angeles** – along with sister stations **KLOS** and **ESPN RADIO 710** – is holding a California-style, "drive-thru" Red Cross fundraiser today through 7 PM.

WSB Radio and WSB-TV Atlanta (Cox) put on a joint fund raising effort this past week for hurricane relief. The viewers and listeners of the Atlanta market rose to the need and pledged \$2,437,000.

Entercom/Norfolk (WWDE, WPTE, WVKL and WNVZ) helped raise \$250,000 on Wednesday (8/31), broadcasting live and teaming with TV station WTKR-TV to run a phone bank.

KNXV-TV Phoenix ABC15 (Scripps Howard) is raising funds for the Red Cross and seeking blood donations through United Blood Services. ABC15 just got a partnership with the Kroger Stores Phoenix - Fry's Markets- with over 70 locations to take donations at the checkouts. UPDATE: The station used phone banks and will continue to do so. They raised a total of \$600,000 by September 13. Main Anchor Jonathan Elias secured an airplane to bring Phoenix Firefighters home from Gulf Coast disaster areas and transport a new crew to the area. He called the CEO of Mesa air directly and asked for the plane. Without the plane, firefighters would have been facing a 30-hour bus ride. KNXV sent two separate crews to help viewers see the reports from on-air people they were familiar with

WLAB radio Fort Wayne, IN in partnership with Red Cross, is encouraging their listeners to drop off cash donations and gas cards at specified locations throughout the week during morning and afternoon drive times. "We kicked off this morning and in only two hours we've already raised \$2,500," said WLAB spokesperson Brian Michaels.

Salem Radio Networks talk hosts Bill Bennett, Dennis Prager, Michael Medved and Hugh Hewitt joined forces yesterday with Feed the Children to raise \$150,000, equal to one-million pounds of emergency relief including ready-to-eat meals, baby formula, emergency water and blankets. “Feed The Children has 18-wheelers filled with emergency food, water and supplies ready to rush to the children and families who need it most,” says Feed The Children Founder & President Larry Jones.

WTNH-TV New Haven, CT donated more than \$600,000 to the Red Cross.



WEWS-TV Cleveland opened a Red Cross/5 On Your Side Hotline, staffed by local Red Cross Volunteers during newscasts on September 5. Monday and Tuesday in early evening newscasts. Wednesday and Thursday from 5 pm – Midnight. WEWS will operate the phone bank Friday from 6:00 a.m. until midnight. As of Friday morning, September 9, WEWS had raised \$500,000. In addition to Red Cross volunteers, students from a local high school staffed the phones. A local woman who was rescued in New Orleans Tuesday by her brother who flew from England to find her also joined volunteers on the phone bank. Next week the Cleveland Indians will join our fundraising effort...as will other area organizations. Also, the over the air stations in Cleveland are planning a joint local telethon next Friday night.

KSBJ Houston is working with local churches to help bring get relief to victims. “Since a lot of people fled Louisiana and came to Houston to escape Katrina, our hotels are full of evacuees,” said Houston’s KSBJ MD Jim Beeler, according to the Billboard Radio Monitor. “We’ve had our broadcast van out in three locations this week collecting gift

cards for gasoline, groceries and long-distance phone calls.”

WNBC-TV New York aired a live one-hour Hurricane Katrina Relief Fund Drive on Wednesday, Aug. 31, in conjunction with the AMERICAN RED CROSS, WNBC's "Hurricane Relief" aired commercial-free at 7 p.m. ET raising \$8 million.

KTLO/KCTT Arkansas Radio will be collecting monetary contributions on 9/2. Salvation Army will join with KTLO and KCTT and The Telephone Connection for a special fund drive Friday, with money designated for hurricane disaster relief. This will include a radiothon.

WFTS-TV partnered with the 5 Clear-Channel radio stations in town -- pushing our viewers to their relief efforts (StormAid.com) as their radio stations push people to our property, where Red Cross is setting up tables tomorrow (Thursday, Sept 1) evening, pre-Tampa Bay Bucs game. (station is located directly across from the East Gate of the stadium.)

Viewers and listeners in Milwaukee will be able to donate to Red Cross through “Katrina: You Can Help” established by Newsradio **WTMJ** and **WTMJ-TV**. The effort will take place between 6:00am and 11:00pm on Thursday, September 1, 2005. The stations will solicit donations from listeners and viewers across the region.

Journal Broadcast Group's 38 radio and 11 television stations are using their communication power to raise funds to help Hurricane Katrina survivors and recovery efforts. The efforts varied from market to market and nearly every station had a unique idea. Through a combination of live phone banks, radio interviews, newscast coverage, radio-thons and public service announcements the stations have secured pledges totaling more than \$1.1 million this first week, with more still coming in.

The **Walt Disney Company** will make corporate contribution of \$2.5 million to the relief and rebuilding efforts for victims of Hurricane Katrina.

Houston's KRBE-FM held a relief drive on Tuesday in which thousands of dollars were raised in less than three hours.

San Francisco **STAR 101.3's** Don Bleu and Uzette are hosting live morning show broadcast today to help those impacted by Hurricane Katrina. Bleu will broadcast live from an area restaurant, encouraging listeners to come by and donate to the American Red Cross and their Hurricane Katrina relief efforts.

WISN-TV Milwaukee Leads 18-Hour Hurricane Relief Effort

WISN-TV and the Red Cross are teaming up for a daylong fund-raising effort on Sept. 1. Beginning at 5 a.m. on WISN "12 News This Morning," the station will open a LIVE Hurricane Relief Hotline staffed by members of the Red Cross. The relief effort will continue throughout the day on Channel 12 and conclude following WISN's late news.

Liberty Corporation has collected five tractor trailer loads of water and plan to send it to Jackson, MS to a central processing center. If they need a truck (or several trucks) at **WLOX** Liberty can ship it directly. Liberty has also have received donations over \$60,000 so far for relief and continue the drive throughout the day.

WTOL-TV Toledo, OH is airing hourly 1-minute appeals to give to the Red Cross and have done, raising close to \$60,000 the first day.



Washington's Modern Music **Z104** Radio's morning drive program – The Mathew Blades Radio Program – hosted an all-day “MBRP Radio Relief” telethon Thursday September 1 to drive awareness and donations to the Hurricane Katrina disaster relief efforts.

KTVO Kirskville, MO is initiating a public service campaign called “Relief Round Up” to promote to viewers the idea of donating through a ‘round up’ of their purchases (at Wal-Mart, Hy-Vee's and area C&R Market grocery stores)

to the next nearest dollar or nearest \$5. The overage will then be donated by the stores to the local Red Cross - who will send it to the national Red Cross, earmarked for the national Hurricane Katrina relief efforts. In addition, on September 7th, KTVO plans to have concurrent promotional events in KV and Ottumwa. We will hold a “Round Up” drive thru at the Kirksville and Ottumwa HyVeets.

The **RAB** is making its online auction software, ezAUCTION, available free of charge to any member radio stations that want to use the service for hurricane relief efforts. Only credit card processing fees will apply.

NBC-TV has approved the right for radio to simulcast, "A Concert For Hurricane Relief," that will run Sept. 2 at 8p (ET).

(9/1) telethon held by Infinity **KEZK/St. Louis** and **KSDK-TV** raised an astounding \$5.17 million for the AMERICAN RED CROSS. The event was hosted by KEZK's KRIS KELLY. At a second telethon, KSDK, \$125,500, for a total of \$5,225,500.

The Grand Ole Opry is donating all of the proceeds from its Tuesday, Sept. 27 show to the Red Cross. They are inviting some of the biggest names in Country to perform that night. Great American Country (GAC), which normally airs the Saturday night OPRY shows – will broadcast this special performance to be carried on Opry's longtime terrestrial radio home **WSM-AM**.

In just over 30 hours, the combined forces of the Mel Wheeler/Roanoke radio cluster (**WXLK, WSLC, WSLQ, WVBE** and **WFIR-A**) have raised (at last count) \$525,800

with their on-air hurricane relief efforts. Each station took different approaches in collecting donations, such as "Pay For Play" requests, "Most Expensive Lunch," etc.

Clear Channel/**Chicago's** Urban Trombo (**WGCI, WVAZ and WGRB-A**) will host a "Hurricane Katrina Drive" with an all day live broadcast today 9/2. The broadcasts will originate from Rev. Jesse Jackson's Operation Push headquarters.

Infinity **KDJM/Denver** will be filling up their listener's cars with free gasoline all day today. Volunteers from the Red Cross will also be on hand to help collect donations for the victims of the storm.

Clear Channel/Denver staff members will be accepting donations for the Red Cross from 6a-6p today at the CCHANNEL offices in the DTC and at the KBCO studios in BOULDER.



Journal Broadcast Group station **KICD Spencer, IA** (14,000 population) raised \$105K in 5 hours Sept. 2. Semi-final total as of 9/3 is \$111,801.85.

Clear Channel **KTBZ** /Houston has now raised \$430,000 from its "Hurricane Katrina Request-Athon" for the Red Cross. The Rob Ryan Show Marathon Has Been On-Air Since 6a On Wednesday (8/31) taking song requests in exchange for cash donations.

Fisher Radio/Seattle (**KPLZ, KOMO and KVI**) are collecting donations at broadcast sites during BUMBERSHOOT music festival. 300,000 people are expected to attend the event sponsored, and folks can drop off donations through the Labor Day Weekend event or go to individual stations website's. Some 40 music acts will play at the festival over the weekend, and air personalities from

each station will broadcast throughout the weekend from donation sites. The local ABC affiliate is joining in with television support. All money goes to the Red Cross.

Radio One **WJMO-A** /Cleveland, along with The Greater Cleveland American Red Cross, Lifebanc, National Marrow Donor Program and The City Mission present "The Praise 1490 Unity in the Community Day" Saturday (9/10). It's a call to action among area churches and schools to give blood through their donor programs and donations.

Archway **KHTE** /Little Rock morning co-host Brad Erickson broadcast live (9/1) at the Pine Bluff Convention Center to raise money for the 1000 plus victims that are being

housed and fed there. Over the weekend Erickson is headed to Louisiana with a group of KHTE listeners to bring supplies and help anyway they can.

The **Desert Radio Group**/Palm Springs cluster's "Operation-Help-Is-On-The-Way" raised \$380,000, far exceeding its original goal of \$100,000. Drg's Palm Springs stations (**KUUU, KCLB, KDGL, KNWZ-A, KXPS-A, KNWT-A**) participated with live broadcasts.

Clear Channel/Bakersfield, CA's radio and TV stations helped raise over \$125,000 through a relief drive on Wednesday (8/31). The money will go to the Red Cross.

Citadel **WOKQ/Portsmouth** staff put on a telethon with ABC-TV affiliate **WMUR**/Manchester on (9/1), raising \$1.1 million. The **WOKQ** "Waking Crew With Mark Ericson & Danielle Carrier" anchored the TV broadcast all morning.

Cumulus **WWCK-A/FLINT** host Dave Barber is launching a national talk radio campaign to delay the new, tougher personal bankruptcy law for two years to allow victims to file under the less stringent rules in effect until October 17.

WFBC/Greenville has been broadcasting live at a local Wal-Mart filling up 18-wheelers (three so far) and will continue the effort through today. The goal is to fill 11 trucks, which will head to New Orleans with night jock DINO along for the ride.

WKZL/Greensboro reports that donations from their community have filled a tractor-trailer, which will now make it's way to the disaster victims.

Citadel/Chattanooga (WSKZ, WGOW and WOGT) along with **WCRB-TV** raised over \$133,000 and collected 13,000 cases of water yesterday (9/1).

KDEC AM/FM in Decorah, IA (pop.8400) worked with a local restaurant to urge businesses and listeners to donate a day's profits, a day's wages, or any amount they could spare to the local Red Cross. That event ran for 11 hours September 7. **KDEC** announcers broadcast live from the restaurant all day, netting donations over \$9,200. **KDEC** met with two community sparkplugs to create "DECORAH CARES," an ad hoc group to generate money for the victims, focused on the town of Bay St. Louis, MS, (which has a small link to Decorah because of a former Bay resident who now lives in Decorah). One of the group's goals is to provide housing in Decorah for now-homeless people from BSL who would be interested. Decorah residents are meeting with BSL town leadership to gauge the interest. The organization has gained real momentum in the 7 days of its' life, and has gotten the help of the local bus company, banks, professionals, churches, food retailers and many more. Our local interview show on **KDEC AM** is focusing on these local efforts with substantial interview time.

Saga Hurricane Katrina Relief Efforts – 9/2/05

Below are reports from most (but not all) of the Saga stations with their plans for fundraising events to support Hurricane Katrina Relief Efforts.

KOAM-TV: Friday (9/2) KOAM is setting up all day on a major parking lot in Joplin across from our bureau and collecting money. We have an on-air schedule promoting that as well as News. We will have representatives from the Red Cross there to accept the money including their disaster vehicles. Several Fire Departments have called and offered to bring Trucks, lights a flashing and Firemen to man the effort. Of course we will have on-air staff there and be doing updates from the location all day. Sort of an impromptu Telethon. If it goes as well as it appears it will, next Friday we'll be in Pittsburg Kansas and the following week Miami Oklahoma. Our take is that MONEY is what is needed. It is also our take that people want an outlet to both give and commiserate. Some may even seek recognition. In every case, we've got that covered. We do have all the phone numbers and web sites posted and shown in every Newscast 5 times a day.



KCOG & KMGD, Centerville, **KLEE & KOTM** Ottumwa and **KELR** Chariton, IA partnered with Lawless Trucking to pickup and transport collections over a multi-county area in south central Iowa. The second semi will be fully loaded today (09/08/05), and both will immediately begin their journey to churches in Mississippi. Not only is a large quantity of non-perishable items included, but we are also transporting clothing and children's items. Quicktron in Albia, Iowa donated the use of its warehouse to serve as a staging point.

Victoria, TX - Victoria has about 200 families that have landed here from the storms aftermath. Since everyone around the country seems to be sending what's collected to the damaged area along Gulf Coast... We are working with the Victoria Junior League to help those families while they are staying here. Friday 9/2 from 6a-6p our news personalities will be collecting toiletries and other day to day needs here at the station for distribution to the dislocated families. Local schools are accepting the children into the classroom because of the anticipated length of their stay here, we are working with a partner in education group to provide school supplies, back packs and other school stuff for those students. We're also supporting the Red Cross, Salvation Army and the local food bank volunteers, who are feeding and clothing these families.

Greenville, MS –We are holding a blood drive tomorrow at the mall to help the depleted blood supply here in Mississippi. Blood is needed badly in our state. As far as for the refugees that have been wandering to Greenville, we are expecting another 300 refugees to make their way to the shelter here, our numbers are already close to 300. The total could reach 600 by early as next week.

Asheville – Full day fundraising event to benefit American Red Cross Hurricane Relief scheduled for Thurs 9/8 from 6am to 6pm with drive-thru convenience at the Asheville Mall. Website donations also will be an option. Pushing for cash, but will have truck on hand for supplies that come in anyway. Those supplies will go to "hearts with hands" (local relief agency) that is sending supplies to the devastated area. Cross-promoting with the non-profit Blue Ridge B'casting stations **WFGW/WMIT**.

Bellingham – KISM - Thursday (9/8) we are going to be out at different locations all day collecting money. We hope to have a member of the Red Cross/Salvation Army/Fire Dept at all these locations and will do call-ins all day. In conjunction with this day we are encouraging local restaurants to do a \$9.29 cent meal deal with a portion of the takings going to the Red Cross/Salvation Army. We are also considering putting together a night of live music whereby local bands (at least 3) will give their time (in conjunction with our local music show, Local's Only) and all proceeds will go to the relief fund. I will keep you posted on other ideas.

Brattleboro – At a Red Cross blood drive event previously scheduled for Thursday (9/1) – broadcasting all day from the location encouraging donations to the Red Cross for Hurricane Katrina victims.

Champaign, IL – All 4 stations in Champaign - **WLRW, WIXY, WCFF & WXTT** will be live at a central donation location for "Illini Aid". Wednesday, Sept. 7 - 6A-6P. We'll broadcast all shows live and solicit donations for the Red Cross Disaster Relief Fund.



We'll also host a satellite location in neighboring Danville. Also working on a free (for donations) concert in the park featuring several local bands and a possible on-campus tie-in with a local nightclub.

Charlottesville, VA -Working with University of Virginia to collect money at Saturday's UVA football game. Will distribute sound to rest of the state to promote the effort. --Joining with the NBC affiliate (live cut ins) to collect money at next week's Friday After Five at the new Charlottesville Pavilion. --Establishing a committee to find and move 10 families to Charlottesville from hurricane area. Will find them jobs, pay all their expenses for three months, provide counseling etc. to get them

established.

Clarksville – All stations are asking listeners to make donations at our websites through various agencies including the Red Cross and the Salvation Army right now... -**Q108** is collecting items for an on-air auction and we are making our Q-Café noon request feature a pay for play feature, -**Eagle 94.3** is doing a pay for play request marathon, -**Z97.5** is going to be collecting 'quarters for the quarter' in honor of the French Quarter in New Orleans, -**Beaver 100.3** is doing a radio-a-thon with the morning show next Wednesday (9/7) and Thursday (9/8) to raise money and items for the victims. We have a different situation here in that our local community of Hopkinsville is also suffering from over 5 million dollars in damage from flooding so we are dividing our focus to help our local community, as well as the people in Louisiana, Mississippi, and Alabama. We are still awaiting word from our local contacts about drop off points where we may be able to truck goods to help the Hurricane victims, so that we may still do a cluster wide collection program of water, diapers, and any other items the victims and their families may need.

Columbus, OH – **WSNY** Hurricane Relief Fund 24-hour morning show marathon on the air Thursday (9/1) for Red Cross. An astonishing \$160,000 was raised.

WODB - live broadcast from Statehouse from 10AM - 3PM next Thursday (09/08) and a fundraising effort from the Hometown Tour broadcast on Friday, (09/09).

Des Moines - All six Des Moines Radio Group Stations (**KSTZ, KIOA, KLTI, KAZR, KRNT, KPSZ**). Thursday, September 8, 2005 from 7 a.m. to 7 p.m. All 11 Dahl's Food

locations stations broadcast the need for listeners to support the Red Cross' Hurricane 2005 Relief Fund. More than \$160,000 was collected at locations and on the website

Greenfield, MA - WHAI/WPVQ are on the Greenfield Common with representatives from the Red Cross on Tuesday (9/6) from noon to 5 collecting donations.

Ithaca, NY - We are working with our local Red Cross for a marathon at our local mall. We are working on a campaign for donate your wages for a day. We have a donation box here. We are teaming with Red Cross and local PODS people (portable on demand storage). Plus we are doing live updates every morning on our local talk show with the local Red Cross and others.

Jonesboro – "Caring for the Coast" Thursday (9/1) and Friday (9/2) from 6am to 6pm, set up at Indian Mall accepting your donations of cash and of bottled water, loading them into the relief truck and then hauling them to the sister-station of a local TV station in Biloxi, MS to distribute to Biloxi residents. <http://triplefm.com/katrina.htm>

Keene, NH – Drive by drop off in Keene at the local Sears plaza on the main drag, all day remote with all 5 stations. Red Cross will be with us too.

Manchester, NH - Drive by drop off at the Mall of NH Thursday (9/1). All 3 stations will be on hand. Also, setting up phone line and online donation lines. Raised nearly \$40,000.

Milwaukee, WI - **KLH** - Gimme Shelter front row Stones ticket auction day of show (next Thu in Dave and Carole)...working on other concert ticket/experience packages. Also our contacts have been in contact with Brett Favre about an event/item to sell – more in the works. **HOG** - Red Cross interviews on AMD, Headhog announcements on how to help

WJMR – Syndicated morning show Tom Joyner is taking a two-prong approach to Hurricane Katrina Relief Effort... 1) Suspending the cash call contest during September and donating that money 2) Raising funds that will assist families that are taking in family and friends. We already know from calls we've received on the request line that people in Milwaukee do have family members taking refuge here. We will place the appropriate forms at the front desk so they can apply for assistance. Anyone wanting to make a donation to this particular cause can go to our website or blackamericaweb.com. We also are in the planning stages for a relief fundraiser. Details to come.

Mitchell, SD – Saga working with the Salvation Army for a special fund drive on Saturday, September 3rd to collect donations that will be sent to the Salvation Army Headquarters in the Gulf Coast. We will also be coordinating a special volunteer recruitment drive for the South Dakota Red Cross. The local Red Cross in Mitchell is in need of additional volunteers that will report to the Red Cross Headquarters in the Gulf Coast.

Norfolk, VA -WAFX PD Mike Beck reports in from vacation – Station doing the on-air and web site efforts and the morning show has covered all angles since Monday. Plus, we'll be at the American Music Festival this weekend where the American Red Cross is collecting donations. We're hosting 4 stages over four days, and we're using this event to promote in-person donations. Looking at another event for next week.

WNOR - Naturally, Tommy & Rumble's shows this week have primarily been devoted to Hurricane coverage and how listeners can best participate in the relief effort. Every official we've spoken with (on and off the air) said the same thing: For the past two days (and the foreseeable future) we are running hourly promos (one cut by Tommy & Rumble, the other by me) urging people to donate. There's also an hourly liner with similar information.

.** 3 Doors Down (from Mississippi) is in town tonight and we are working with them on a canned food drive. We are broadcasting live from the event.

.** There's a huge festival at the Beach this weekend and our personalities will be working with the Red Cross collecting donations. The Flying Svengs, the station band that features Rod Fitzwell, Tim Parker, and Chuck The Intern, are among the bands playing and are spearheading the collection drive (and donating the money they were to be paid).

.** Motley Crue is coming Tuesday. We were originally going to do a special "Motley Crue-sday" ticket giveaway with Tommy & Rumble (a 5-4-3-2-1, which each winner getting a meet and greet). We're strongly considering changing that to an auction with the money going to the Red Cross.

Northampton, MA - 93.9 The River and WHMP will be broadcasting live from the corner of Main & King streets in downtown Northampton from 10 AM – 2 PM on Friday, September 2, 2005. 93.9 The River is holding a "Relief Request Weekend." Listeners who make a minimum donation of \$10 to The American Red Cross can pick any song from The River library to air this coming Labor Day weekend.

KPHO-TV Phoenix reported on two weeks of Hurricane Katrina relief efforts including more than \$300,000 in cash donations and almost 20,000 hours pledged in volunteer hours and services. On August 30th, CBS 5 partnered with the American Red Cross Grand Chapter and Clear Channel Radio Phoenix for a four-day telethon. In a joint effort on September 6-7, 2005 CBS 5 Fulton Homes Power of 5 and the Volunteer Center of Maricopa County began a volunteer pledge drive for viewers to call and pledge their time and services to the survivors of hurricane Katrina. In only 4 hours of live coverage during this two-day event, more than 1,102 viewers pledged more than 18,800 hours of time. That amounts to 10 people working full-time for one year at a value of \$331,344.00.

Portland, ME - Tuesday morning 9/6 each of the 7 Portland Radio Group stations will execute a 28 hour radio-a-thon on-air in conjunction with the local Red Cross. Each station will have its own "bank" of phones. This will allow stations to put callers on the air as desired. Promos have hit the air this afternoon. There will also be a local website component for listeners to make donations.

Spencer, IA – All three stations participating in a Radiothon on Friday (9/2) to collect funds for Red Cross. Already have commitments for dollars from some local organizations.

Springfield, IL – Caring for the Coast – fundraiser Saturday with all stations 6a-6pm. At local grocery store broadcasting and collecting funds for Red Cross. Also working on a plan to fill a moving truck with the items needed in Greenville MS bringing these items directly to the TV station to donate to the MS branch of the American Red Cross.

Springfield, MA - Both Rock 102 & Lazer were set up side-by-side Thursday in the courtyard of the Holyoke Mall at Ingleside for 4 hours Thursday AM, along with The Red Cross for a Hurricane Relief Drive and raised \$1,600. An additional fundraiser is in the works for next week.

Yankton, SD – Yankton: We will be doing a Radiothon on both **WNAX** and **Big Country** from 6 AM to 6 PM on Saturday, September 10th. Big Country will be playing requests for pledges. Other plans are in the works. We have a meeting set up for Wednesday, 9/7, to finalize plans on both stations.

Saga Radio Networks - All running Red Cross PSA's and this morning heard from the Louisiana counterpart....Louisiana News Network....They're in the thick of it. They stress making sure the red cross donations get labeled to (Katrina) and what the area needs is money!
...End Saga Stations...

WPTV-TV West Palm Beach (Scripps-Howard) hosted a four-hour live telethon (9/1) on our station to raise funds for the Hurricane Katrina relief effort through the American Red Cross. We began running promos on the station on Tuesday and continued that through the beginning to the event on Thursday. The telethon was from 4-8PM, preempting our normal early fringe (Oprah) and access (Extra and ET) programming and significantly changing the presentation of our local newscasts. While we signed off from the telethon at 8pm, the phones continued to ring into our phone bank for hours. When we finally ended the telethon that evening we had raised over \$503,000 for the Red Cross

KSNW/Wichita Raises \$1 Million

The Emmis Communications Wichita team has helped fill more than 23 semi trucks full of food and water. Most of that has already been taken to the victims in the Gulf. Some of it is being stored in a warehouse in Wichita to help feed almost 2,000 evacuees headed to Wichita. In addition, with the station phone bank, KSN donations, viewer cash donations and private donations-- the station has helped the Salvation Army raise more than **\$1 million**.

Emmis/Phoenix Collaboration

Phoenix stations Power 92.3 (Emmis Communications) is teaming up with The Zone 101.5 (Infinity Broadcasting) to help the victims of Hurricane Katrina. Even though these

two stations are from two different companies, they are putting the “radio competitor’s angle” to the side and working together for the common good. Both stations will be asking their listeners to donate non-perishable food, water, over the counter medicine, clothes, and money to transport to the victims in New Orleans. Trucks and drivers are being donated by “Service By Air” in support of this effort. The stations will be set-up at Wal-Mart locations around the valley and doing live broadcasts from those locations. Look for the large semi trucks in the parking lot and the radio stations vehicles. DJ’s and staff from both companies will be working together on each others airwaves to maximize the collection efforts. The kick off for this event is scheduled for 6am Tuesday, September 6th, 2005 and will run as long as Phoenix keeps giving! Lists of items will be available at each location for listeners who wish to donate. They can pick up a list and go shopping at Wal-Mart!

This past Friday, La Crosse, Wisconsin area media coordinated and promoted a 12 hour (6am – 6pm) fundraiser for Hurricane Katrina relief efforts. At the end of the 12 hour event, just over \$400,000 was raised. Broadcasters that participated in this fundraiser included **WXOW-TV, WKBT-TV, Family Radio stations and La Crosse Radio Group** stations. The stations promoted the event Wednesday through Friday, and then each aired numerous live reports throughout the day on Friday from in front of the La Crosse Center in downtown La Crosse, which was the donation drop-off location. La Crosse broadcasters plan to continue with a community wide effort to raise more funds for hurricane victims through the month of September.

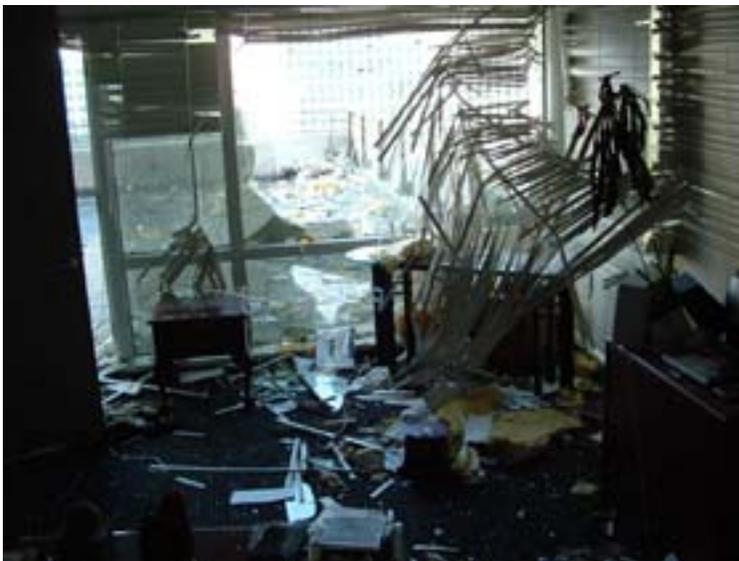
KCBD-TV (Liberty) has teamed with Red Cross, Salvation Army and the 19 United Supermarkets in DMA to allow for direct donations at the checkout counter. We have been doing 2 minute cut-ins since 5:30am this morning and will wrap up the initial launch at 10PM tonight. We partnered with local radio stations to help promote and plan on promoting the Relief effort for the next 4 weeks. Tied in with a local radio group yesterday and today and are set up in the parking lot of the local mall. So far our viewers have donated over \$120K and we will be there until 6 p.m. today. Just got word from the local Red Cross that Lowe's has announced they will match up to \$2M in donations so we are trying to coordinate to have the money donated at the local Lowe's store so the matching funds will be available. We also have almost 6 tractor trailer trucks full of bottled water that will be taken to a central distribution point in Jackson, Mississippi to deliver to the appropriate areas.

KGBT-TV Harlingen, TX (Liberty) - We have the MDA telethon this weekend and are tying the 2 together. MDA will have special numbers for donating monetarily to the relief. MDA national is giving \$1M. We are doing a food/water drive in our parking lot all day Monday as part of the telethon. May extend that drive in the AM show through next week.

WTOL-TV Toledo (Liberty) tied in with the local Red Cross yesterday and today. Hourly cut-ins live from their HQ. Our talent rotated throughout the day. We are

currently around \$170,000 and will probably top out at \$200,000 by the end of the day. We are evaluating other choices for next week. Your ideas are great.

KPLC-TV (Liberty) launched our drive with the local Red Cross chapter Monday afternoon, as the storm was still passing through the affected coastal areas. Did live remotes all day Tuesday and into Wednesday. Collected goods for shelters (food, bedding, clothing, etc) and also arranged for care of pets via LaPaws and the area's animal shelter. Tuesday night there was a line of cars over a half-mile long waiting to unload goods at the Civic Center (three unloading crews working simultaneously) ...required police assistance for traffic control. Collected enough goods for two coliseum-size shelters, finally Red Cross asked us to announce that we had enough goods. Drive for monetary contributions continues; as of today we have collected an estimated \$150,000. Citgo's Venezuelan owners are also pledging \$1-million to the ARC.



Former KPLC anchor/reporter Laila Morcos, now with WWL Radio New Orleans (**Entercom**) has been evacuated from New Orleans where she has reported on the storm and aftermath. (*See storm damage to WWL studios left*). She has co-anchored several newscasts giving her first-person perspective on the story and is also providing packaged reports on New Orleans

refugees here in LC. She will co-anchor our Sunrise news all next week (Laila escaped N.O. with the clothes on her back; she has lost her home, car and all personal belongings). We continue to respond to changing ARC shelter needs as they arise. A number of local construction jobs are being made available to refugees, many of whom do not have the OSHA-required shoes needed. We've coordinated contributions of these so that these folks can become transplants rather than refugees.

WAVE-TV Louisville, KY (Liberty) - *We've teamed with Red Cross and Kroger to allow for direct donations to the Red Cross at the checkout counter. It's easy to set up, we promote it on air and in content and it's raising a ton of money. We have teamed with Clear Channel radio stations allowing us to double the promotion.* Papa John's has printed 1.5 million window and car banners each showing individual support to the affected state, i.e., Sweet Home Alabama. Papa John's has absorbed all the printing cost. They are selling for \$1 with all proceeds to the Red Cross. We are using content to promote.

* \$100,000 rubber bracelets have been ordered imprinted with "Storm aid". We are working in partnership with Clear Channel radio stations and will distribute these at all the area Thornton's convenience stores. All proceeds to the Red Cross.

* Storm aid the Concert will be held September 10th at the Riverbats baseball stadium. Co-promoting it with Clear Channel and Triangle Talent.

What started as an idea is becoming a virtual love fest among good corporate citizens and city officials. We're not ready to announce the artists involved, but without question with Kentucky's country music contacts, this should be a star-studded event. All proceeds to the Red Cross and Salvation Army.

* Beginning Tuesday and going indefinitely we will do a nightly hour telethon from 7-8PM with cut-ins from 4-6 in the afternoons. We will ask local businesses to come in and man the phones. We think this works well as most of our customers have asked for ways to get involved. * Plans are underway to organize a statewide KY Broadcasters Association radio and television telethon. We've not confirmed the date, but our initial plans would be to kick it off the day of our Storm aid concert.

WIS-TV (Liberty) and the Red Cross as of 4 PM Eastern had raised \$159,000. Phone bank, promos & news segments will run until 7:30 PM. Hope we can do as well as sister stations in other markets.

KXAN-TV/NBC (Lin Television) Austin announced today preliminary results of Care for the Coast, a one-day food and funds drive held Friday, September 2nd throughout the city. "Our partners at the Capital Area Food Bank are still working to sort and pallet the products collected yesterday. More than 30 tractor-trailers of food, water, and baby diapers were sent to the distribution facility," shares Carlos Fernandez, General Manager. "On top of the requested food items, we received cash contributions of approximately \$400,000. Used by the Capital Area Food Bank, those funds translate into 2 million meals – it's just awe-inspiring." Care for the Coast supported the food bank, which is part of America's Second Harvest. Working with FEMA and the American Red Cross, collected items are being deployed to hurricane-ravaged areas in the gulf, as well as areas now housing evacuees in Texas.

Emmis-New York

WRKS-FM (98.7 KISS FM) is currently on-air asking listeners to donate to the KISS Cares Foundation for the victims of the hurricane. In addition, \$1 of each ticket sold for our 4th Annual Night of Healing Concert at The Theater at Madison Square Garden on September 13th will be donated to relief efforts. The proceeds of each will go to The American Red Cross.

WQHT-FM (HOT 97) is running sweepers asking people to visit our station website and urging them to donate to relief efforts. The website gives them a list of reliable organizations that are collecting cash and a list of those that need cash as well as volunteers.

WQCD-FM (CD101.9) is on air urging our listeners hourly to donate and providing organization contact information as well as our website info which provides reputable and efficient organizations providing relief efforts.

Emmis - Terre Haute (Radio & TV)

In 13 hours, our stations...**WTHI-TV...HI-99...and 105-5 The River...**raised more \$75,011 for the American Red Cross Disaster Relief Fund. It is a testament to the power of our stations, to the people who work here and to the families of the Wabash Valley.

Emmis/Chicago

WLUP-FM - Loopfest 2005, Sunday, September 5th at Charter One Pavilion starring Def Leppard. Half price tickets will be offered day of show with a \$15 cash donation at the box office. In addition, all proceeds from Loopfest apparel sold at the show will benefit America Red Cross.

WKQX-FM - For the weekend of September 9th thru 11th Q101's My Shuffle music featured a fund raising machine. People will submit their six song playlist via Q101.com and make a credit card donation online. Random selections will be played throughout the weekend.

Emmis/Austin

The listeners of **News Radio 590 KLBJ in Austin** showed AMAZING generosity last Friday as they helped the station raise **OVER \$165,000** in a single day for the American Red Cross! KLBJ AM partnered with the Austin Fox affiliate for an all day fundraising event. We kicked off the day with a special live edition of the Morning Show from 5:30am-10:00am from a local Carrabba's restaurant, and continued to collect donations and do live call-in reports from the scene at the hour and half-hour for the remainder of the day until 7pm. Fox 7 covered the event in each of their three Newscasts (morning, lunchtime, and evening news.) We received donations from businesses, but mostly from individual listeners – several personal donations of \$10,000 each were made! \$165,000

is more then double the amount of money ever raised by KLBJ AM in a single day before.



KGSR FM did a similar broadcast event on Friday from 6am-2pm and raised approximately \$46,000 of their own! Combined Emmis Austin Radio was able to give well over \$200,000 to the American Red Cross.

WYLE-TV for over 15 years has broadcast a local program called "Unwired." During these years on several occasions we have done various fund raising and relief efforts in times of need. It is obvious, that most of these efforts pale in contrast to the tremendous needs of this Hurricane Tragedy. We are organizing the "Unwired Jam for Hurricane Relief". Furthermore, we will be glad to join with the broadcasters in any US markets who wish to join together to sponsor the "Unwired Jam for Hurricane relief" in their market. We have talked to some of our friends and fellow performers and we can attract celebrities from all aspects of show business.

Fairfield Broadcasting Company Stations

Kalamazoo, MI - September 7: Fairfield Broadcasting Company, is set to launch an all day fundraiser for the victims of Hurricane Katrina. All four radio stations, **WQLR Q-106.5, AM 590 WKZO, AM 1470 WKLZ, and AM 1660 WQSN**, will devote their broadcast day to raising money for Red Cross relief effort, and take donations from the public in its parking lot, and at Expert Auto Service in Portage. Fairfield will be asking it's listeners for donations, in the form of cash or check, with proceeds going to the Red Cross, Salvation Army, and America's Second Harvest Food Basket. **UPDATE:** Total funds raised were \$44,000.

Cat Country 98.7 / WYCT Pensacola has created a relief effort to aid the families that evacuated from Louisiana, Mississippi, and Alabama to the Pensacola area to escape Hurricane Katrina. Learning that hundreds if not thousands of people came here "temporarily" only to find they have no home to return to, or have been denied access to their home city until basic infrastructure is restored, Cat Country 98.7 is working to find temporary housing for evacuees / survivors of Hurricane Katrina.

United Radio Broadcasters Of New Orleans

In response to the aftermath of Hurricane Katrina, the radio groups serving New Orleans and the surrounding area have come together to form the United Radio Broadcasters of New Orleans. The United Radio Broadcasters of New Orleans is a joint effort to provide the region with complete, reliable and consistent radio broadcast of emergency recovery and relief information. It is comprised of stations operated by **Clear Channel Radio**,

Entercom Communications independent stations **1470 KLCL** in Lake Charles and **1290 KJEF** in Jennings. An estimated 15 stations are combining programming and engineering resources and have begun airing the same broadcast. Programming consists of continuous news, information and coverage of local relief efforts, and will include live feeds from street reporters and interviews and updates from local officials and relief coordinators. A toll-free 800 number will allow listeners to call in with their experiences, eyewitness reports and questions. In addition, the stations will share a helicopter to transport engineers to transmitter sites and assist in the evacuation of employees as needed.

WSFA-TV Montgomery, AL (Liberty) partnered with Cumulus and Clear Channel radio stations broadcasting live from the various Lowe's stores. Lowe's is matching half of the donations. Alabama Governor Bob Riley said that the response of the people of Alabama "is overwhelming when WSFA asks them to be generous." By September 9, WSFA had raised \$1,060,910, before the Lowe's match.

Clear Channel radio stations are mounting their own hurricane relief to Louisiana this week - to help out fellow broadcasters. At least nine staff members from **WLW** - including engineers, production and on-air talent - plus other personnel from Clear Channel stations in Columbus and Cleveland flew to Baton Rouge Tuesday. They include WLW talk show host Mike McConnell, news reporters Bill Reinhart and Brandy Schrader and weekend talk host Darryl Parks, the station's operations manager. "The real

mission is to go down and help out our stations," said Parks. "Many of the station employees are homeless. It's about being able to free them up for three or five days so they can take a breath and deal with their personal lives. ...They have been working around the clock."

West Virginia Radio Corp radio stations raised \$135,000 for the American Red Cross.

WHO-TV Des Moines, IA has undertaken an ongoing on-air campaign "Iowa Cares," running public service announcements and locally broadcast on-air requests for donations for hurricane victims.

22 Million Watch Shelter from the Storm:

ABC, CBS, FOX, NBC, The WB and UPN held a joint prime time special, *Shelter From the Storm: A Concert for the Gulf Coast*, Friday, September 9, to raise funds for Hurricane Katrina. In the collaborative effort, the six broadcast networks presented the one-hour commercial-free simulcast from 8-9 p.m. The entertainment special/fundraising event was broadcast live from locations in New York and Los Angeles to the Eastern and Central time zones and tape-delayed in the Mountain and Pacific time zones. It was also made available to other broadcast networks, cable networks, radio stations and broadband Internet providers. In addition to the 22 million network six-network viewers, another 1,750,000 watched on Spanish networks Azteca America and Univision.

Univision Communications has partnered with the American Red Cross to assist in fundraising efforts aimed at helping those in need due to the devastation resulting from Hurricane Katrina.



Minnesota Radio Stations - On September 9, 2005, nearly 200 radio stations across the State of Minnesota joined together in an unprecedented partnership to broadcast live from 5 a.m. until Noon to raise funds for the Red Cross. During “River of Relief,” many of the stations had their morning show personalities broadcasting live from the Washington Avenue Bridge in downtown Minneapolis (See photo above). The bridge spans the Mississippi River, connecting the east and west banks of the University of Minnesota. During the Friday broadcasts, listeners had a chance to hear a wide variety of interviews from victims, experts from the American Red Cross, the University of Minnesota and more. An e-commerce website and phone lines will continue to be provided for listeners to make a financial donation to the American Red Cross Disaster Relief Fund during this live broadcast time period. **Radio One, Clear Channel** and the **Minnesota Broadcasters Association** are among those organizing the effort. As of September 9 at 5:00 p.m., they had raised \$867,596.

WSPA-TV (Spartanburg, S.C.) held a telethon last Wednesday and Thursday that raised more than \$530,000 in pledges for the American Red Cross. Now it is teaming with Goodwill Industries to raise even more funds and supplies for Hurricane Katrina victims. Any clothing or household goods donations to Goodwill will be converted to cash and donated to the American Red Cross relief effort in the name of Goodwill and WSPA News Channel 7. The station will be broadcasting live from Goodwill locations in Greenville, Spartanburg, Anderson and Greer, S.C.

WYFF-TV (Greenville, SC) held a phone bank on September 1, and raised \$640,000 for the Red Cross.

WKDK-AM (Newberry) - teaming with the Newberry Opera House, local musicians, local churches and local merchants for an upcoming Benefit Concert this Friday (September 9) in Newberry's Memorial Square. The event features many of the finalists from our local musical artists competition called Local Legends. Also running a pledge drive tomorrow (September 8) from 6a to noon with special interviews, music, etc. All donations will be delivered to the event on Friday and turned over to the American Red Cross. Running daily updates on local disaster relief efforts such as a bottled water run last Friday at the high school football game and a supply drive that started yesterday.

Tickets on sale (9/6) For **Rush Limbaugh's** "Rush On Broadway" Show At The New Amsterdam Theater In New York, with proceeds earmarked for hurricane relief. Sean Hannity will introduce the show, produced with **WABC-AM/New York**.

Magic 104 North Conway, NH raised \$23,000 on Wednesday 9/7/2005 with their Day Of Sharing radiothon. They joined with the Red Cross, Conway Scenic Railroad, local chamber of commerce and Hannaford Grocery Store. People donating to the Red Cross were given passage on a 5-hour scenic train ride through New Hampshire's White Mountains. There were also free breakfast and a lunchtime BBQ for those who donated.

Michigan Broadcasters - More than 215 Michigan Broadcasters have answered the Governor's call for a unified Michigan response to Hurricane Katrina relief. Both commercial and public radio and television stations have agreed to participate in the Michigan Cares/ Michigan Gives fundraising effort concentrated Friday, September 9, from 6-9 a.m. and longer if programming allows.

KRCG-TV and the generous viewers in mid-Missouri donated \$23,000 over the Labor Day weekend and received another \$6,000 for the NAB BroadcastUnity Relief. \$29,000 total. KRCG will participate actively on Friday 9/9 and will continue to collect relief funds through Friday 9/17 - so that all can contribute.

American Urban Radio Networks (AURN) has joined with the NAACP to provide relief for the victims.

NextMedia (Myrtle Beach) raised \$6,000 at an all day remote at Costco. Cooked hotdogs and sold them for a donation. Tomorrow, Thursday, September 8) all the radio and television stations in Myrtle Beach will come together for an all day event at Broadway At The Beach. We know 100k+ is possible but feel the sky's the limit. This event starts at 7am and is called the Total Media Relief Rally.

WEZV-FM (Myrtle Beach) - A huge event scheduled for (9/8) with all the radio stations and TV stations in town. We're doing a "TOTAL MEDIA Hurricane Relief Rally" at Broadway At The Beach. We'll all be broadcasting together....one giant event for all media...(including the daily newspaper...The Sun News) Our goal is to raise at least \$100,000. We already got lots of pledges and matching pledges, etc. Lots of community participation...theatres sending performers, etc.

Christian Way FM stations (**WAYJ**/Ft. Meyers, FL, **WAYF**/West Palm Beach, FL, **WAYT**/Tallahassee, FL, **WAYM**/Nashville, TN and **WAYH**/Huntsville) together in 36 hours collected 70 tons of diapers and baby wipes for Convoy of Hope estimated at \$1.2 million and filling 3 semi-trailers.

WCBI-TV Columbus, MS had a simple idea to help their friends in gulf coast of Mississippi that turned into one of the greatest outpouring of kindness station staff had ever witnessed. Wednesday (August 31) **WCBI-TV** began an on-air campaign asking viewers to bring to the station any non-perishable items they wished to donate. Expecting they might fill a truck load to go to the coast within a couple days, they promoted the campaign with cut-ins all afternoon and evening and did “live” shots from the front of their studios during 5 p.m. and 6 p.m. news. The first truck left for Gulfport that night and was the first load of supplies to arrive in the Gulf Coast city. By noon Thursday the second truck pulled away. And it never stopped. Friday the campaign continued, filling and sending a total of six trucks to the gulf coast in two days. By Wednesday, September 7, one week after beginning the drive, viewers had donated enough non-perishable items to fill and send 18 semi-trailer loads to Katrina victims.

Legend Communications **WRYV** Huntington/Gallipolis, OH's hurricane relief effort, which began as an attempt to fill one truck with supplies, expanded into a three-state effort with a big boost from Poison lead singer Bret Michaels. During a (9/1) morning interview to promote his concert in Charleston, singer he pledged a cash donation to the River Relief Fund and announced plans to make similar donations at each stop on his solo tour. The relief effort, which began with an all day broadcast, expanded into a two-day marathon as businesses and individuals from across the West Virginia, Ohio, And Kentucky tri-state area pitched in.

Cumulus/Lexington's **WXZZ** and **WLTO** teamed up to take donations in the Fayette Mall parking lot, and in two days they collected over \$140,000 for the Salvation Army. Local TV station **LEX 18** also helped, as did area firefighters.

Styles Media/Panama City, including **WILN**, **WYYX**, **WYOO** and **WVVE** held Operation Bay To The Bayou. They broadcast live all weekend from local mall and raised over \$25,000 and filled to two semi-trailers with goods for Katrina evacuees.

Clear Channel/Huntsville, AL has already done one event with Lowe's, but will be doing another next week with Publix Super Markets. Listeners were able to drop off donations with Red Cross volunteers that were set up in the Lowes parking lot or give donations inside Lowes at the cash registers. The total for the two-day drive last week is \$850,862.92.

Next Media **WSOY-A**/Decatur, IL teamed up with **WAND-TV** (9/2) as **WSOY-A OM**/morning host Brian Byers began broadcasting at 6am and didn't stop until 12-1/2 hours later when \$250,000 was raised.

KTOO-FM (PBS) Juneau, AK will host Katrina: Juneau Responds, a live on-air marathon from 8:30 – Noon September 9 to raise funds for the American Red Cross. The marathon is part of a coordinated nationwide effort of all broadcast stations on September 9th. Public stations are usually prohibited from conducting on-air fundraisers for charities, but last week NPR requested and the FCC granted a blanket waiver of the rules to allow public stations to join in the relief efforts.

WWUZ and **WYSKA&F**/Fredericksburg, VA got together and raised a staggering \$460,000, 12 tractor-trailer truckloads and 9 buses filled with bottled water, canned food, and diapers to benefit the victims of Katrina.

Beasley WKIS /Miami raised over \$80,000 in just 8-hours by selling tickets for their upcoming annual, "KISS CHILI COOKOFF." Tickets were sold for the event, coming up on JANUARY 29th featuring KEITH URBAN, with 100% of the proceeds going to the Red Cross, at \$100. Normally the ticket would cost \$32. WKIS will continue accepting both cash and supplies in their upcoming appearances. Other Beasley efforts:

Working with a local TV partner, Miami's Power 96 WPOW-FM headed out to the streets with their station vehicles and on-air personalities. On one day, \$10,000 was collected.

Fayetteville, NC:

WKML-FM, WFLB-FM, WZFX-FM, WUKS-FM, WAZZ-AM & WTEL-AM rallied together 9/1/05 at a local shopping center, Westwood Shopping Center. All stations vans were present, broadcasting live with on-air personalities doing what they do best! This was a partnership with the Salvation Army. Event took place from 6a – 6p and \$35,000 was raised (\$25,000 cash, \$10,000 goods).

Coastal Carolina:

Greenville, NC Oldies 107.9 **WNCT-FM** has raised to date \$37,000 for its "Operation Bellies & Butts." Goods are collected that feed little bellies (formula, baby food) and clean little butts (diapers, wipes, baby lotion, etc.). The morning hosts, Jerry & Donna, are driving the items to Baton Rouge. This one is interesting because they asked their listeners what they wanted the show to do. This area of NC has endured horrible flooding due to hurricanes. Listeners said from their own experience that these items were the most essential. Ryder Trucks has donated trucks & US Cellular is providing camera phones and free email to the personalities to use during the trip.

Philadelphia:

Wired 96.5 **WRDW-FM** – On 9/2/05 met at a Wal-Mart parking lot, encouraging listeners to begin filling a semi-trailer with bottled water. The event is called "Rocco's Ride to Hurricane Relief," for the station's morning host, Rocco the Janitor, and took place over a five-day span. Wired 96.5 staff will be driving the truck to hurricane victims.

92.5 XTU **WXTU-FM** is hosting Alan Jackson at Philadelphia's Tweeter Center on Saturday, Sept. 10th. For every ticket sold, Beasley Broadcast Group, Alan Jackson and the Tweeter Center will each donate \$1.00 towards relief efforts. If all seats are sold, donations have the potential to reach \$75,000.



KCII AM & FM Washington, IA will collect donations at many locations for hurricane victims Friday, Saturday and Sunday, September 9, 10 and 11.

WCLO-AM and **WJVL-FM** radio in Janesville, WI are coordinating efforts with the Salvation Army and Red Cross to raise money on Thursday, September 8th including a drive-through donation drop and live broadcast from 7am-2pm. The effort will continue with

broadcast support of a silent auction at the local mall on Friday and airing of the broadcast unity PSAs.

The Connecticut Broadcasters Association, joining with Broadcasters nationwide, has designated this Friday, September 9th, as Broadcast Unity Day. Broadcasters statewide will provide special programming and special relief appeals in a continuing effort to aid the victims of Hurricane Katrina. The CBA has already provided financial contributions to the community Broadcasters of Mississippi and Louisiana to help get them back on the air. Individual Broadcasters within the state are and have been broadcasting Public Service Announcements and have done individually designed Relief Campaigns since the day after the storm landed.

Among the fund-raising initiatives in Connecticut will be the following:

WLIS in Old Saybrook and **WMRD** in Middletown will air special informational programming every hour of the day and will also conduct a two-hour on-air auction.

WHCN, WKSS, WPOP, WWYZ, and WPHH, the **Clear Channel Stations** in Hartford will be airing \$25 song donation promotions, PSAs directing listeners to web site donation information, on site broadcasts from sporting events to collect donations, a "Stormaid" concert in Waterbury, and a 6 hour remote broadcast from the Wal-Mart at Charter Oak Marketplace to collect donations for the Red Cross.

The **Cox Stations** in Stamford-Norwalk, **WSTC, WNLK, WKHL, and WEFX**, will be broadcasting live from the Norwalk Seaport Oyster Festival all weekend asking for donations and pledges for the Red Cross.

WCCC in Hartford will be airing extra Red Cross PSAs along with emphasizing donations at live events.

Foreign language station **WRYM** in Newington will continue a heavy dose of PSAs for the Red Cross and the Salvation Army with DJs following up between songs.

Campus station **WQUN** at Quinnipiac University has prepared and will air hourly all week 12 different PSAs each for different relief agencies. The station will be helping the City of New Haven assimilate storm victims with long for interviews with local officials.

Even a High School station will participate, **WQTQ** at Weaver High will frequently have their student DJs direct listeners to the FEMA.gov web site for donation information.

All the state's TV stations have on-going fund raising promotions this week. Specifically, Ch-8 has done an all day telethon in cooperation with the Cox Radio radio stations **WEZN** and **WPLR**. Ch-30 has raised over \$300,000 to date with cut-ins, local news coverage, and web site activity.

Susquehanna **KRBE**/Houston is holding the "104 KRBE Cares Katrina Relief Drive" (9/6) from 7a-7p at select Kroger locations to benefit victims currently taking refuge at Houston's Astrodome and other area shelters.

Clear Channel/Augusta **WBBQ**, **WIBL**, **WEKL**, **WKSP** and **WPRW** have been working with local CBS-TV affiliate **WRDW** and the Red Cross on a fundraiser called "GULF AID"- raising cash donations at WAL-MART locations in Augusta, GA and Aiken, SC. Over \$165,000 was raised. Phase two of fundraising kicks again, mid-week.

WJBC-A, **WBNQ**, **B104**, and **Thunder 93.7**/Bloomington, IL staged a two-day fundraiser for the Red Cross. The stations set up in the parking lot of the Schnucks' Supermarket. Additional money was collected during the Labor Day Parade, bringing the total raised to more than \$129,000.

Christian **WSMJ**/Freemont, MN is partnered with other radio stations, media outlets and businesses through out the Maine for Operation Help Out. Cash s and bottled water and non perishable food items are being collected at Maine Bank & Trust location and Bisson Moving & Storage will provide freight service to the Nazarene Disaster Response depots in Alabama and Louisiana.

Clear Channel/Albuquerque and local TV station **KRQE** teamed up (9/1) in a 12-hour drive that took in \$174,000 in cash and 125,000 lbs. of non-perishable food items for the Red Cross.

Infinity/Hartford, including **WTIC-F**, **WRCH** and **WZMX** had a Pay For Play Weekend event raising \$182,289 for the Red Cross.

NRG Media stations and **KETV 7/OMAHA** broadcast from 6am-7p (9/2) and collected over \$89,000 from drop-off locations throughout Omaha.

Clear Channel **KVUU** /Colorado Springs was well on its way to raising \$99,999 for Hurricane Katrina victims. At last report, over \$55,000 was in the fast-growing coffers. Morning host Craig Coffey started last Thursday, (9/1) and vows to stay on the air until the goal is reached.

Red Wolf Broadcasting **WWRX** and **WBMW** /NORWICH, CT launched Operation K.A.R.E. (Katrina Area Relief Effort) with a 24-hour broadcast and raised over \$30,000 in cash and supplies.

Idaho Radio - 35 Idaho radio stations in the Boise and Twin Falls markets will come together for "Radio Relief" - a broadcasting roadblock September 9 during the Broadcast Unity day. All stations from each major group (Citadel, Clear Channel, Journal, Lee Family and Locally Owned) are represented - as well as a number of independent broadcasters.

KDTH-AM; KATF-FM; KGRR-FM and **WVRE-FM** of Dubuque, IA have done the following to raise funds/supplies for the victims of Hurricane Katrina.

1) Friday 9/2 from 6am until 7pm 4 stations broadcast live from two super markets in Dubuque soliciting listeners to donate to "Operation Water Relief". The idea was to then purchase bottled water to ship to the survivors. In the 13 hours we raised just over \$50,000, which was enough to purchase 13 semis full of bottled water. The local JayCee organization organized the trucking. 2) We worked with the local JayCee chapter soliciting donations of blankets, cleaning supplies, diapers, paper goods, toilet paper, pillows, plastic cups and silverware. In two days of promotion we filled two semi's full and they were shipped out today. 3) On 8/29 - the day after Katrina, we coordinated (for the first time in the community) all financial institutions to open an account for the Red Cross where people could make donations. We have been promoting this effort since then and to date have raised just under \$150,000 for the Red Cross Relief effort.

In conjunction with the NAB, **Illinois Broadcasters** and the **Wisconsin Broadcasters** will participate with the Unity Day Red Cross announcement on **WEKZ-AM / WEKZ-FM / WQLF-FM** on Friday September 9. They will also air announcements hourly regarding local organizations and businesses in Wisconsin and Illinois that are helping with relief efforts regarding items needed for donations and drop off locations.

UPDATE: Illinois Broadcasters' Association 19 hour "Illinois Broadcasters Unite for Red Cross Hurricane Relief" came to a close at 11pm this past Friday, September 9, with a phenomenal grand total of \$6,488,793 in cash donations to the Red Cross proving once again the power of broadcasters in time of need. A combination of corporate donations and call in credit card donations made it possible. Governor Blagojevich spent two hours. Senator Dick Durbin stopped by to make a \$500 donation and congratulate the broadcasters and volunteers.



Bryan Broadcasting
KNDE/Bryan-College
Station, TX pulled in over
\$20,000 from a 12-hour
marathon broadcast.

KOMO/KCTS Seattle 90-
minute telethon September 6
to raise funds for Gulf Coast
residents affected by
Hurricane Katrina topped
\$186,000 for the American
Red Cross.

WDSU has provided wall-to-wall coverage since the Saturday morning before the storm hit. We have never stopped, even after our transmitter was flooded, streaming on wdsu.com 24/7. We have been back on the air in N.O. for several days on Pax 49 and are now on the air in Houston on the Pax station there, also channel 49. We are back in our building in N.O., which was not damaged, and using our studio. We are maintaining our broadcast through the facilities of WAPT in Jackson and WESH in Orlando and have crews on the ground and in the air throughout the N.O. area and in BR and Houston. This is a company-wide effort for Hearst-Argyle, involving personnel from all of our stations around the country.

WMDC Mayville, WI will be participating in the one-day fund-raising blitz for hurricane victims that was inspired by the National Association of Broadcasters, donating a minimum of a minute of air time an hour for 24 hours on 9/9 so listeners can learn where and what can be donated. Station manager Tom Biolo said, "I believe a majority of the Wisconsin stations will participate on Friday. **WBEV** and **WXRO** focused their efforts on collecting money for Waveland, MS, a city with a population of 7,000, that was almost destroyed by the hurricane. As of September 7, the station had raised almost \$9,000.

WVIR Charlottesville, VA has coordinated with the Red Cross and **WWWV/WINA** to team up and have a fundraiser on the downtown mall on September 8. All funds will be given directly to the Red Cross representative that is there that night. The stations have been airing PSAs throughout the week to let people know they can come out on Friday and support our neighbors in the gulf coast states.



Lancaster, PA. Three local radio stations are taking to the airwaves September 8 to raise money to help Hurricane Katrina victims. **WSOX 96.1**, **WARM 103** and **WSBA** are

gathered at the Bon Ton parking lot of Park City Center in Lancaster along with the American Red Cross, where they are collecting "drive-by" donations. Mad Dog, of WSOX's Morning Drive, said it's easy to help. "It's real convenient. You drive in, don't even have to get out of the car -- it's kind of like fast food only minus the food," he said. The stations are broadcasting until 6 p.m. tonight. All the money raised will go to the American Red Cross.

Washington DC's Modern Music **Z104** will co-sponsor a "Capital Scene Rock for Relief" benefit concert Sunday September 18 in Falls Church, VA, from 4 – 10 p.m. featuring local artists. All the entertainment will cost only a \$10 cover charge, with the proceeds going to the American Red Cross Hurricane Katrina disaster relief fund. The event will be hosted by Z104 midday personality, Jenni Chase, who hosts a weekly "Capital Scene" local music program every Sunday evening at 9 p.m. on Z104. "The local music scene is filled with talented bands who are also incredibly generous and giving of this talent in a time of national crisis," says Chase. "Everyone at Z104 is appreciative of the artists, entertainmentdc.com, and the State Theatre for their efforts in helping us put together a great concert for a great cause." Bonneville station Z104 can be heard on 104.1 FM in Greater Washington, DC and 103.9 FM in Frederick. Z104 also raised \$5,000 the morning of September 8 with an auction of Jack Johnson tickets.

WLTX-TV Columbia, SC held a phone bank for the Salvation Army September 2 and raised \$175,000 for Katrina relief. The station is running PSA's every day for Red Cross & Salvation Army and participating in Broadcast Unity Friday as well. Citadel Broadcasting (Charleston) implemented the Power of 5 where we encouraged people to bring 5 dollar bills to a local bank (Regions Bank which is based in Louisiana) in conjunction with WCSC-TV as a cross promotion. They have raised 107K thus far and are also filing up trucks and sending them to Louisiana.

MIX 101.5 WRAL-FM, WRAL-TV5 and Fox 50 WRAZ Raleigh, NC are partnering with The Food Bank of Central and Eastern North Carolina for Operation Storm Relief September 8 to help victims of Hurricane Katrina.

NNB Fairbanks had a very successful live remote broadcast, which we simulcast on our 3 FM stations at various locations around Fairbanks on Tuesday, September 6th. In conjunction with the Red Cross of Alaska, more than \$2,000 was raised for hurricane relief efforts. Starting on Sept. 2nd, NNB Fairbanks began running a series of red Cross PSAs for Hurricane relief as well as PSAs we produced in house. NNB Fairbanks has also created Links to the Red Cross with a banner on all of our radio station websites which are promoted on air, on a regular basis. We are also promoting "Fairbanks Cares" a live fundraising event taking place this weekend which involves live performances, silent auction, music, comedy and theatre.

KYW and **WPSG** Philadelphia will both participate in Broadcast Unity Day on Friday 9/9/05. Locally produced PSAs will tie this project into our Operation Brotherly Love

efforts and close with a mention of the primetime concert airing Friday night on both stations.

The Kokomo, Indiana community has been tremendously generous to the Hurricane victims. As soon as the extent of the devastation was realized, church organizations were ready to reach out and the first call they placed, was to the radio stations of Kokomo and Howard County. **WZWZ-FM, WIOU-AM, WMYK-FM** (Mid America Radio Group) and **WWKI-FM** (Citadel) went into action to communicate the needs to the community of nearly 100,000. Since the appeals went out, Kokomo has sent over 50 tons of food and supplies to the disaster area. The Howard/Tipton County Chapter of the American Red Cross has received over \$50,000 in cash donations and has trained over 100 new Disaster Assistance Volunteers.

WKVI-AM & FM held a radio-thon Friday, September 9th. The effort was coordinated by the station's 5 member staff in only six days and was the direct result of the NAB's call for action. Station Manager Ted Hayes announced on Monday that to date over \$33,164.00 has been pledged to the fund with more money coming in. The response is all the more astounding because Starke County does not have an American Red Cross chapter. All of the money raised is being sent to the South Bend office. The dollar figure far exceeds all other radio-thons held in the past.

Radio One, Infinity, Clear Channel and **Cumulus** are all supporting a Sept. 17 "Heal the Hood" concert in Atlanta.

Thunderbolt Broadcasting Stations **WCMT AM/FM WCDZ FM** Martin-South Fulton-Dresden, Tennessee collected cash and food items with local police and fire fighters at the Tennessee Soybean Festival during its five day run. The station sold copies of a local high school football game broadcast for \$10.00 each and donated all monies to the American Red Cross. In addition to airing the Unity Day announcements Thunderbolt stations aired a remote from a local church who was loading a trailer to go to Mississippi and Louisiana and promoted a number of locations that were taking up donations of food, clothing and water for hurricane victims.

Listeners to **Clear Channel/San Diego**'s eleven stations contributed coins, bills and checks equivalent to 19,890 pounds, an estimated \$275,000, during "Storm Aid" at Qualcomm Stadium.

Billboard

More than 20 of Tulsa's radio and television stations teamed up Friday to raise money for Hurricane Katrina Starting at 6 AM Friday, morning commuters grabbed a cup of coffee and emptied their pockets, all to help the Red Cross and Hurricane Katrina victims.

KOTV - The News on 6 - set up shop early Friday morning at LaFortune Park to help



out with the Broadcast Day of Unity. News on 6 reporter Omar Villafranca was there. More than 20 TV and radio



stations crowded the airwaves, asking, pleading and some even begging their listeners to drop off some dough. And people were listening. At the end of the day, Broadcast Day of Unity had collected over \$100,000, all for the Red Cross.

20 Tampa Bay area stations put their competitive differences aside and joined together at Raymond James Stadium, where they raised over \$210,000 for the Red Cross.

Saga owned-**Des Moines Radio Group** has updated the total they and their local partners have raised for the Red Cross to \$160,000. The week and a half long campaign has been conducted at a local grocery chain.

KCCI-TV Des Moines (Hearst-Argyle) is supporting numerous fund-raising efforts to benefit victims of Hurricane Katrina. The station began promoting the "KCCI Cares/American Red Cross Disaster Relief Fund" almost immediately after the disaster with public service announcements, phone banks and special fundraising events and promotions. After the disaster, the station immediately set up phone banks during its 5pm & 6pm newscasts to take donations. Because of overwhelming response, the phone banks continued throughout the week, ultimately raising over \$132,000.

KTIV-TV, Sioux City, Iowa, developed a partnership with a local newspaper, The Sioux City Journal, and a local bank, Security National Bank, soliciting funds to be given to the American Red Cross. As of Tuesday morning (9/13) the fund was at \$25,000.



As of September 12, Citadel Broadcasting had received donations of \$4 million dollars and counting. Citadel will deliver at least 130 18-wheel truckloads of water and other goods to relief checkpoints in South Louisiana. Citadel started wall-to-wall coverage on WIBR Baton Rouge, Saturday, August 27 at 2pm and began simulcasting that effort on its cluster of stations in Baton Rouge. Two of their signals in New Orleans were eventually lost, but we kept Diva 92.3 on the air for the entire simulcast non-stop, and were able to help supply generator power to Clear Channel in this time of need. It continued airing non-stop coverage from WIBR until midnight, September 11th before going back to its music format. UPDATE: Citadel had received financial donations, water, and other items in the amount of **well over \$4 million dollars and counting.**

From Mike Hammond, Citadel Knoxville: We left at 6 a.m. Knoxville time Friday with nine trucks. Eight were filled with water and one was filled with food from ConAgra who asked to go along on our convoy. We were given police escort out of Knox County to the next county. We contacted the Tennessee Highway Patrol and got clearance to bypass scales since we were traveling to the relief area. Dave Foulk was on the lead truck and provided hourly reports on their status as they headed to Baton Rouge. Fuel was a definite issue. Most of our trucks had two tanks - enough to get to Baton Rouge and back to at least the Birmingham area. A couple of trucks had smaller tanks but were able to find fuel in Meridian, Mississippi to make sure they had enough without getting stranded. Foulk reported lines at gas stations over a mile long as they headed into Louisiana. Diesel was not to be found at all after they left Meridian. We received word that there had been unconfirmed reports of trucks being hi-jacked in Baton Rouge. We contacted our Sheriff who contacted the authorities in Baton Rouge and were escorted once we got to the city. We were instructed to take off our Disaster Relief signs. Once in Baton Rouge, we had thought we would take all the trucks to one location. However, the need was so great we actually went to four locations. The ConAgra Truck was taken to the Second Harvest Food Bank location which was completely out of food. Unloading the water was a definite issue. People got students from Southern University to help unload at one location. The sheriff went to the jail and got 100 inmates to unload and they worked until 4 a.m. unloading water at the locations. We have four trucks filled with water going today to Valdosta, Georgia. We were contacted and asked to send the other trucks there since officials were using the air base there to send water and supplies to Mississippi, Alabama, and La. In all, 13 truck loads of water and one truck of food. The people in Baton Rouge could not have been more appreciative. In fact, people would drive by our trucks with hand painted signs saying "Thank you." There is no question, a major need was met by our listeners. Damn, I love this job and this company. Mike Hammond

From Eddie Haskell, Citadel-Albuquerque:

We started out at 6 a.m. expecting to get enough water to fill a U-Haul truck. By 7:15 it was clear we'd need a bigger truck. We mentioned it on the air and within a half hour we had a semi trailer ready to fill with bottled water. As we started loading we realized we'd need pallets... and a forklift. Both arrived within 15 minutes. A listener called and said "you need to wrap that water with shrink wrap to keep it from shifting... I'll be over with some wrap in a few minutes and show you how to do it". By noon we had filled an entire semi truck trailer with bottled water and supplies. But no tractors or drivers. Within 10 minutes of our request we were turning drivers and rigs away. Drivers offering their rig

and DAYS of their time to drive the trucks. By the end of the day, we had completely filled THREE semi trucks and were starting on number 4.

A dentist office called and asked if they could bring toothbrushes and toothpaste. A listener called and said her young daughters had asked if they could bring dog food. "Where will the puppies get food?"

Listeners showed up empty handed and said "how can I help". They spent HOURS stacking and wrapping the water for transit.

One listener bought 10 pallets of water at Costco and brought it in his pickup 2 pallets at a time. When the last load came, he said "I just bought 10 more" and headed off for the next run. All told... one listener... 40,000 bottles of water.

A six year old girl showed up, struggling with gallon jugs of water, accepting no help. She had spent her tooth-fairy money to buy 4 gallon jugs of water.

When we asked on the air for a sign company to make a banner for us (a little self-promotion), a first grade class made three banners to put on our trucks. They were hand-painted and said "Thanks" and "Gracias" and had their class picture attached.

A young lady showed up to write a check for the relief effort. She is from Biloxi and has family there. She hasn't heard from any of them. Juan, sensing that she was upset, walked up and said "are you OK?" She said "no" and fell into his arms sobbing.

As we would help people unload their cars they would say "thank you SO much for doing this". After THEY took off work, bought the water, brought it to us and helped us stack it... they thanked US. Even though the people receiving all these supplies are far away, this is LOCAL community service. We're doing it for OUR community. To help them do the good that they want to do.

Day 2 starts in 8 hours.

From John Hager, Citadel-Buffalo:

Brian- 97 Rock/WGRF Buffalo just auctioned off a pair of tickets and meet and greet with Motley Crue for tonight's area show. Two bidders finally agreed to each take one of the tickets and backstage passes for \$15,000 each! The first winner was just here and left us with a certified check made out to the Red Cross, and the other person, who we know, is on the way. **\$30,000 to meet Motley Crue** and help the cause. Lots more going on with all the stations that we will summarize later.

Citadel-Nashville:

We had a Trisha Yearwood show last night for WKDF loyal listeners at a club inside the arena here in Nashville. In the welcome center in the arena prior to the show I met a family that is in Nashville from New Orleans. They are one of the lucky ones that made

it out. They drove from New Orleans to Nashville searching for a place to stay last Sunday. We invited them in for the show hoping to give them a little distraction. After the show we spend 30 minutes talking to them. In the conversation I had a chance read them this e-mail from Brian Jennings with some of the highlights of what our stations have done and are doing for the relief effort. And then I watched a mother, father and 3 kids cry..... The father ask me to please send a message of thanks to each of you for what you are doing for the families that didn't make it out of the area..... So from a man who still doesn't know if he has anything to go home to but is thrilled to have his family safe..... thank you!

Friday's food drive sponsored by **Clear Channel's** radio stations and Rainbow/PUSH generated so much food that 25, 18-wheelers were needed to transport the food, water and clothes to those in need in Alabama, Mississippi and Louisiana. Chicagoans began arriving at PUSH's headquarters at 930 East 50th St. as early as 5 p.m. and continued until 9:30 p.m. as the drive was being pushed on **WGCI-FM/107.5, WV AZ-FM/102.7 and WGRB-AM/1390.**

When the station's announced the relief fund on their broadcasts scores of people began making phones calls offering their supports their support through financial contributions, food, housing and jobs for those victims. **WGCI** radio's "Crazy" Howard McGhee, Ramonski Luv, Nikki Woods and others were on hand getting the word out to aid the Hurricane victims.

Brentwood, TN students' telethon gets \$72,000

Averaging about \$14,400 an hour in donations, a five-hour telethon Friday night September 9 produced by Brentwood High School students piled up \$72,000 for victims of Hurricane Katrina. The final tally left bleary-eyed organizers overjoyed and amazed yesterday by a project created by students and supported by teachers, parents and the community. When the hurricane hit, students were looking for ways to help. Lauren Bushey, 17, wanted to do more than donate her \$50 paycheck. Then her mother reminded her that Brentwood High has its own television station and enough equipment to create a telethon.

With each ring of the phone, Northeastern Pennsylvanians showed their generosity Thursday, September 8, donating an estimated total of \$294,627.66 for the victims of Hurricane Katrina. Thursday's donations even surpassed money raised during the

Northeast Pennsylvania News Alliance's
Sept. 11, 2001 telethon



WGAL-TV Lancaster, PA (Hearst-Argyle) held a telethon from 5:30 a.m. to 9 p.m. Friday September 9 to raise money for hurricane relief for the Red Cross, Salvation Army and Mennonite Disaster Relief. The station already has raised \$300,000 for the groups.

Infinity Radio Seattle has collected nearly \$470,000 worth of clothing, classroom supplies and cash for displaced students of Hurricane Katrina in an all-day collection drive.

Clarke Broadcasting Corporation of Sonora, CA, has raised \$119,697. The truly amazing part of this story, they report, is that they did it in just eight hours.

And from the Twin Cities, KTIS has announced that all proceeds from the upcoming KTIS Sharathon Concert, featuring Scott Krippayne and Point of Grace, will be designated for hurricane relief. The concert will be held on Thursday, Sept. 22 at 7 p.m.

Channel 8 **KLKN-TV** Lincoln, NE (Citadel) in cooperation with the Red Cross collected donations in the parking lot of the station September 2 from 8:30am-6:00pm. Approximately \$12,000 was raised during the event. On September 8, KLKN joined Hy-Vee and Lincoln Clear Channel Stations raised about \$14,000 during a fundraising event from 6am-7pm at the North 27th HyVee in Lincoln. KFRX and KIBZ broadcast live remotes and Channel 8 KLKN-TV broadcast live during the Channel 8 Eyewitness News Midday program. KLKN-TV produced five local :30 PSA announcements and 2 local ID announcements asking viewers to make donations to the Red Cross for victims of Hurricane Katrina.

On Friday September 2nd, **WDAY Radio/TV** Fargo, ND (Forum Communications) partnered with the Salvation Army for a fundraiser for Hurricane Katrina relief. Officials of the Salvation Army, while being interviewed on WDAY, expressed a need for funds for the work ahead in the Hurricane aftermath. They also expressed a hope that businesses in our area would take in kettles for fundraisers for the effort. To kick off the community wide effort to jumpstart Hurricane Katrina relief, WDAY partnered with Krispy Kreme donuts in South Fargo and broadcast live from 6am to 6pm on Friday, September 2nd. We conducted a drive-thru fundraiser and WDAY radio and TV personalities greeted donors. By 7pm that night we had raised approx. \$69,000. In the days after, more dollars poured in and the most recent total has a tally of \$75,000 raised from this WDAY TV & Radio effort for the Salvation Army's efforts to aid Hurricane Katrina victims.

New Hampshire **WMUR TV** (ABC) partnered with Saga's **WZID FM** and **WMLL FM** as well as Citadel's **WOKQ** and **WPKQ FM** for a day-long telethon and raised \$1.2 million. **WOKQ/WPKQ** held a separate "pay for play" event for 28 straight hours. Koor Communications, in the western part of the state, has four independently owned and operated stations (**WNTK AM/FM**, **WUVR AM** and **WNBX AM**) held a benefit concert called "Operation Picking up the Pieces." While many stations participated in BroadcastUnity Day, many were already running and have continued to run donation information at least once an hour. Most stations produced their own PSAs but some used the Red Cross PSAs made available.

On September 7, Go Radio Broadcasting's Fargo, ND FM radio stations

held an all day radio-thon from Hornbacher's Foods locations to raise money for the Red Cross/Hurricane Katrina. Hornbacher's Foods pledged to contribute matching funds of up to \$1,000 at each of the five stores. Over \$101,000 in cash was collected during this 12-hour event...and the money continues to pour in. Stations were: **KLTA FM, KVOX FM, KEGK FM, KQWB FM, KPFX FM.**

On September 9, **WTAE-TV** Pittsburgh (Hearst-Argyle) hosted a phone bank during newscasts raising \$514,663, then hosted a one-hour telethon simulcast on all Pittsburgh TV stations with combined total reaching \$633,000.

WQVA-AM Irmo, SC on September 9 participated with **WIS-TV** in a phone bank and raised \$300,000. The station is having a relief concert on Sept 23

KWXX Hilo, HI broadcast live for 12 hours on radio stations from 4 KTA Superstores around the Big Island. **KAOY, KNWB, KPUA** shut down most of their business operation on that day to send DJ's, sales people and office staff to the four locations to man the donation tables and broadcasts. The stations raised \$29,269 for the Red Cross Katrina fund during the 12-hour broadcasts.

Three Sons Broadcasting's **WRHI-AM and WVSZ-FM** Rock Hill, South Carolina raised \$126,485 with their Hometown Cares initiative.

Appendix B

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

In the Matter of)	
)	
Closed Captioning of Video Programming)	CG Docket No. 05-231
)	
Telecommunications for the Deaf, Inc.)	
Petition for Rulemaking)	

To: The Commission

**REPLY COMMENTS OF
THE NATIONAL ASSOCIATION OF BROADCASTERS**

**NATIONAL ASSOCIATION OF
BROADCASTERS**

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December 16, 2005

TABLE OF CONTENTS

Executive Summary	i
I. Introduction.....	1
II. Marketplace Incentives Are Sufficient To Ensure Quality Captioning	2
III. The Commission Should Refrain From Establishing Accuracy Standards And Instead Should Focus On Constructive Solutions To Improving Captioning	5
IV. Because The Record Demonstrates Both A Shortage Of Real-Time Stenocaptioners And Significant Costs For Captioning News Programming, The FCC Should Not Alter Its Electronic Newsroom Technique Regulations.....	11
V. The Commission’s Regulations Should Foster The Development Of New Caption Technologies.....	16
VI. Conclusion	17

Executive Summary

The National Association of Broadcasters hereby submits these reply comments in response to the *Notice of Proposed Rulemaking* in the closed captioning of video programming proceeding. When the FCC adopted closed captioning rules to implement Section 713 of the Communications Act, it sought to provide “a fair balance between the interests of persons with hearing disabilities and video programming interests.”

Many of the comments responding to the Commission’s *Notice of Proposed Rulemaking* demonstrate that (1) the current regulatory regime and the competitive video marketplace maintain this carefully crafted “balance” and (2) the proposed caption standards would do little to improve captioning quality, cannot alleviate the shortage of real-time stenocaptioners and do not benefit the overall public interest.

Of particular concern is the FCC’s proposal to prohibit the use of Electronic Newsroom Technique (“ENT”) beyond the Top 25 markets. Faced with declining news revenues, and the capital expenditures of the digital television transition, the comments demonstrate that the proposed prohibition would significantly impede broadcasters’ ability to serve their local communities, especially for small and medium market stations. The likely result would be a loss in local news coverage. The proposed regulations are also likely to have counter-productive consequences, such as deterring the development of more cost-effective captioning technology.

Finally, while NAB supports streamlining the captioning complaint process, we urge the Commission to refrain from imposing additional regulations on television broadcast stations at this time. In lieu of onerous standards, the Commission would more

effectively improve caption quality standards by working with captioners to establish “best practices” for the captioning community.

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Closed Captioning of Video Programming)	CG Docket No. 05-231
)	
Telecommunications for the Deaf, Inc.)	
Petition for Rulemaking)	

To: The Commission

**REPLY COMMENTS OF
THE NATIONAL ASSOCIATION OF BROADCASTERS**

I. Introduction.

The National Association of Broadcasters (“NAB”)¹ submits these reply comments in the above-captioned proceeding. In implementing Section 713 of the Communications Act, 47 U.S.C. § 613, dealing with Video Programming Accessibility,² the Commission sought to provide “a fair balance between the interests of persons with hearing disabilities and video programming interests.”³ As discussed below, many of the

¹ NAB is a nonprofit, incorporated association of radio and television stations and networks that serves and represents the American broadcasting industry.

² In the Matter of Closed Captioning and Video Description of Video Programming *Report and Order*, MM Docket No. 95-176, 13 FCC Rcd 3292-93 (1997) (“*Report and Order*”); In the Matter of Closed Captioning and Video Description of Video Programming, *Order On Reconsideration*, MM Docket No. 95-176, 13 FCC Rcd 19973 (1998) (“*Reconsideration Order*”).

³ *Reconsideration Order* at ¶ 15. Section 713 of the Communications Act recognized the need to balance the goal of achieving full accessibility with the economic and technical constraints broadcasters and other program producers face. The statute empowers the FCC to exempt programs and classes of programs or services where “the provision of closed captioning would be economically burdensome to the provider or owner of such

comments filed responding to the Commission’s *Notice of Proposed Rulemaking*⁴ demonstrate that (1) the current regulatory regime and the competitive video marketplace maintain this carefully crafted “balance” and (2) the proposed caption standards would do little to improve captioning quality, cannot alleviate the shortage of real-time stenocaptioners and do not benefit the overall public interest, particularly for those broadcasters who rely on Electronic Newsroom Technique to serve their local communities. While NAB supports streamlining the captioning complaint process, we urge the Commission to refrain from adopting at this time additional costly regulations that will clearly burden television broadcast stations, especially ones in smaller markets.

II. Marketplace Incentives Are Sufficient To Ensure Quality Captioning.

The Commission seeks comment on a number of captioning requirements, including technical and non-technical quality standards ranging from spelling, grammar and punctuation to verbatim or edited for reading speed, incomplete or unsynchronized captions. *Notice* at ¶¶ 10-18. Previously, the Commission declined to impose standards governing the quality of closed captioning, noting the difficulty of establishing standards, the administrative burden that would be imposed on video programming providers and

programming.” 47 U.S.C. § 613(d)(1). The statute also permits providers and program owners to seek an exemption on a case-by-case basis where captioning requirements would create an undue burden. 47 U.S.C. § 613(d)(3). As the Conference Report explained, Congress specifically contemplated under this latter provision that the Commission “shall balance the need for closed captioned programming against the potential for hindering the production and distribution of programming.” H.R. Report 104-458, 104th Cong. 2nd Sess. (1995) at 183.

⁴ In the Matter of Closed Captioning of Video Programming, *Notice of Proposed Rulemaking*, CG Docket No. 05-231, rel. July 21, 2005 (“*Notice*”).

the Commission if such standards were adopted, and the marketplace incentives for programming providers to ensure the high quality of captioned programs.⁵

Given the intense level of competition in today's video marketplace, broadcasters have a compelling economic incentive to ensure that their programming is accessible to all Americans. NAB agrees with Caption Colorado that the Commission's rules have already been "demonstrated to be effective and efficient."⁶ In fact, as Cosmos Broadcasting, *et al.* points out, the Nielsen rating system does not exclude hard of hearing viewers from its diary panels. Comments of Cosmos Broadcasting, *et al.* at 10. Thus, broadcasters have a built-in economic incentive to ensure quality captioning. And as captioning becomes ubiquitous, beginning with the 100% new programming benchmark in January, 2006, there are additional market incentives for "video programming providers and distributors to differentiate their programming on the basis of the quality of captioning, rather than just the existence of captioning." Comments of United States Telecom Association at 6. Simply stated, the marketplace provides the appropriate incentive to ensure that captioning is, and will remain, a top priority for video programming providers.

Before the Commission imposes significant and burdensome regulatory measures, it must first demonstrate that its decision is supported by a sufficient factual record.⁷ While other parties have cited examples of captioning errors, the record does not

⁵ *Report and Order* at ¶¶ 222-224.

⁶ Comments of Caption Colorado at 4. *See also* Comments of KJLA, LLC at 4; Comments of the National Cable & Telecommunications Association ("NCTA") at 3; Comments of Echostar, L.L.C. at 8.

⁷ *See, e.g., Cincinnati Bell Telephone Co. v. FCC*, 69 F.3d 752, 763 (6th Cir. 1995) (court rejected restrictions on cellular providers' participation in certain auctions as arbitrary because Commission failed to factually support the rules).

evidence a widespread marketplace failure of broadcasters' delivery of high-quality captioning that warrants a change in the agency's course at this time. As Caption Colorado points out, the examples raised by the *Telecommunications for the Deaf Petition*⁸ "may not reflect the current status of the industry. Our company actually logs the amount of downtime it experiences on each of its station or network customers and the percentage or minutes of missed captioning is negligible." Comments of Caption Colorado at 29.⁹ Broadcasters, who collectively caption hundreds of thousands of hours of broadcast programming, have not received a large number of complaints, either directly by consumers or via the Commission, to alert them to serious inadequacies in the overall quality of captioning. Also, viewers may naturally notice and focus on the few errors that appear in closed captioning, rather than on the high percentage of captioning that is error-free.¹⁰ Thus, captioning that has an outstanding accuracy rate may still trigger complaints.

Although the comments in this proceeding do not evidence any widespread marketplace failure that warrants regulatory change, NAB nevertheless agrees that the Commission should streamline its complaint process to ensure that, for the few occasions where viewers experience glitches with their captioned programming, there is an effective method for contacting programming providers. *See* Comments of NAB at 4-6. We agree that it should be clear to consumers where captioning complaints should be directed. However, any requirement to post specific phone numbers or e-mail addresses

⁸ In the Matter of Closed Captioning of Video Programming, *Petition for Rulemaking*, Telecommunications for the Deaf, *et al.*, RM Docket No. 11065, filed on June 23, 2004.

⁹ *See also* Comments of DIRECTV, Inc. at 2 (stating that there is insufficient evidence that significant captioning problems exist to warrant regulatory change).

¹⁰ *See* Comments of Caption Colorado at 29-30.

on the Internet must be limited to those stations that have already established Internet websites.¹¹ Along with the NCTA, NAB also supports a shortening of the complaint process to 30 days from receipt of a complaint. *See* Comments of NCTA at 8. NAB recognizes that timely responses to captioning complaints best serve American consumers.

III. The Commission Should Refrain From Establishing Accuracy Standards And Instead Should Focus On Constructive Solutions To Improving Captioning.

Although NAB supports streamlining the complaint process, further revisions to the Commission's captioning rules are unwarranted and highly unlikely to lead to an improvement in captioning quality. Governmental regulation simply cannot eliminate the human error component associated with creating and encoding captions. Despite broadcasters' very best efforts, captions will have both technical and non-technical errors. The captioning community clearly recognizes these inherent limitations. For example, technical glitches can cause captions to "display to the viewer on her or his television at a lower quality due to a variety of circumstances between the creation and the viewing." Comments of National Captioning Institute at 2. And "since the caption data is inserted directly into the television transmission signal, anything blocking the signal path will cause the captions to become garbled or disappear all together." Comments of NCRA at 7. Technical glitches also include problems associated with viewers' reception, problems that are wholly outside the control of the broadcaster.

¹¹ The FCC adopted this approach in its EEO proceeding. There, the Commission specifically limited its requirement that broadcasters post the EEO public file report to those stations that already had a station web site. *See* In the Matter of Review of the Commission's Broadcast and Cable Equal Employment Opportunity Rules and Policies, *Second Report and Order and Third Notice of Proposed Rulemaking*, MM Docket No. 98-204, 17 FCC Rcd 24018 at ¶ 141 (2002).

Indeed, the Commission has specifically noted that “[t]here are a variety of circumstances where captioning may be problematic. Such situations include, but are not limited to, equipment failures, the inability to obtain captioning resources on short notice or the receipt of programming without the expected captions.” *Reconsideration Order* at ¶ 10. The Commission further emphasized that it would not consider “*de minimis*” amounts of uncaptioned programming a violation of the rules. *Id.* NAB thus urges the Commission to refrain from defining technical standards and establishing forfeitures for failure to reach captioning standards that are unattainable.

NAB also concurs with Media Captioning Services that establishing “standards” will not yield benefits, but rather will place “a huge administrative compliance burden on the FCC, video programmers and caption companies.” Comments of Media Captioning Services at 21.¹² This is especially true for non-technical standards, which are defined, controlled by, and may vary by, the person who creates the captions.¹³ Particularly problematic is establishing accuracy rates for real-time captioners.

Despite some commenters’ calls for establishing accuracy standards of 99 percent or near 100 percent for real-time captioning,¹⁴ the record does not demonstrate that such rates are feasible. For example, Caption Colorado notes that the Commission’s proposed

¹² See also Comments of Caption Colorado at 3 (“adoption of standards for realtime captioning could result in one of several potential adverse consequences to the television industry”).

¹³ See Comments of the National Court Reporters Association (“NCRA”) at 3 (“Nontechnical standards go the skill, knowledge and the ability of the realtime captioner, and is the one area where the realtime captioner has control over the actual quality of the captions”).

¹⁴ See Comments of American Society for Deaf Children at 1 (“consumers should be able to expect 100 percent or near 100 percent accuracy of captions”); Comments of WGBH at 8 (“accuracy rates should be 99% or above”).

three percent error rate would be “absurdly low” if the Commission’s standards did not take into account the inherent limitations of real-time captioning, such as the necessity to paraphrase, to drop non-essential words, problems with unclear speech, speech that is articulated at a pace faster than 180 words per minute, etc. Comments of Caption Colorado at 23. The Accessible Media Industry Coalition (“AMIC”) indicates that its average error rate is higher than the Commission’s proposal, at about 5 percent. *See* Comments of AMIC at 12. Similarly, Media Captioning estimates that a 95 percent accuracy rate is the functional equivalence of accurate, although there are variations due to pace of speech, number of speakers during a program, etc. *See* Comments of Media Captioning Services at 7. Other estimates as to the accuracy of real-time captioning performed by captioning services is significantly lower. For instance, NBC Telemundo’s own analysis shows accuracy rates “of no better than 84 percent according to a straightforward word-error metric.” Comments of NBC Telemundo, Inc. at 7.¹⁵

Beyond showing the Commission’s proposed error rate to be unrealistic, these variations in the accuracy estimates between commenters underscore an inherent problem in defining specific error rates. Because there are necessary omissions and choices involved in providing real-time captioning,¹⁶ it is nearly impossible to establish benchmarks for determining whether a program has been accurately captioned. For example, how could accuracy rates for non-verbatim captions or for captioning for unspoken dialogue be established? Should there be a separate accuracy rates associated with different speeds of dialogues or number of simultaneous speakers? And as AMIC

¹⁵ *See also* Comments of NCRA at 10 (Some proponents of a near 100 % captioning 100% accuracy rate for captioning may be under the impression that “captions are automatically created via specialized equipment”).

¹⁶ *See, e.g.*, Comments of National Captioning Institute at 3; Comments of the Motion Picture Association of America at 7.

points out, caption placement (which must take into account reducing screen obstruction and identifying speakers) is often a matter of stylistic difference. *See* Comments of AMIC at 5 and 10. A delay in rollout or pop-up, which may be inappropriate for some programming, is appropriate in other contexts. How would such issues affect accuracy standards for caption placement? Especially for breaking news or unscheduled programming, there can be a delay in securing stenocaptioning services. *See* Comments of NBC Telemundo, Inc. at 7. In short, calculating appropriate error percentages for the editing choices that captioners make, and the delays that may occur with breaking or unscheduled programming, is extremely difficult, if not impossible.

Just as regulation cannot improve the accuracy of real-time captioners, it also cannot eliminate occasional captioning errors associated with pre-produced programming. NAB respectfully disagrees with Media Captioning Services that errors in pre-produced programming are “the result of deficiencies in the production process, pressure to meet production deadlines, and/or ineffective quality control procedures.” Comments of Media Captioning Services at 10. As with captioned live programming, pre-recorded programming is susceptible to technical glitches along various points of the distribution chains, including glitches with viewers’ own equipment. *See* Comments of the Motion Picture Association of America at 4 (“MPAA”). And as articulated by AZN Television, *et al.*, offline captioning can take several days to complete; in some cases, due to production schedules, the only viable captioning method available to programming producers and distributors is real-time captioning. *See* Comments of AZN Television, *et al.* at 20. Thus, while NAB agrees with the New Jersey Division on Civil Rights that there needs to be flexibility to allow private industry to serve the public, we do not concur that there should be no allowable errors for pre-produced programs. *See*

Comments of the New Jersey Division of Civil Rights at 2-3. Nor should the Commission adopt its proposed 0.2% allowable error rate for pre-produced programs. *Notice* at ¶ 15. As Caption Colorado notes, the reality of strict schedules and other financial considerations do not always allow time for multiple reviews of captions to guarantee that each word and phrase is captioned verbatim. Comments of Caption Colorado at 9. Therefore, for a variety of reasons, captioning for both live and pre-produced programming is susceptible to occasional technical and non-technical errors.

In addition to the difficulty in establishing accuracy rates for captioned programming, the costs associated with imposing standards far outweigh any commensurate benefit. Notably absent from the record is any indication that imposing both technical and non-technical standards, and imposing forfeitures for failure to comply, can, by any significant measure, improve the quality of closed captioning. To the contrary, fines to encourage captioning compliance are unnecessary and “would likely even be counter-productive to the objectives of the FCC’s Captioning Regulations in several respects.” Comments of Caption Colorado at 32.¹⁷ Were, for instance, the Commission to adopt non-technical standards, there could be a significant increase in the per hour cost of captioning.¹⁸ The potential consumer harm in imposing unreasonable qualitative standards, with associated increased costs, for closed captioning is very real.

¹⁷ *See also* Comments of Home Box Office, Inc. at 7 (stating that additional regulation would stifle flexibility and innovation and would do little to improving the amount and quality of closed captioning).

¹⁸ *See* Comments of Media Captioning Services at 17-18 (stating that rise in costs “may very well be the intended objective of certain companies actively pursuing federally mandated closed captioning ‘standards’”); Comments of Caption Colorado at 17 (requirements could result in “doubling of the current cost of realtime captioning”).

Faced with task of delivering “perfect” captioning or risking significant forfeitures, local stations may err on the side of caution and refrain from airing live, local programming, including breaking news and emergency weather information.¹⁹ Such a result would be contrary to the Commission’s efforts to promote localism. NAB agrees with Cosmos Broadcasting, *et al.*, that the proposed regulations would “shift the focus from serving local viewers to meeting artificial appearance standards.” Comments of Cosmos Broadcasting, *et al.*, at 8. This clearly does not benefit the public interest.

Indeed, Congress did not intend for the Commission’s captioning rules to result in the loss of programming choices.²⁰ The Commission therefore should not impose regulatory benchmarks so onerous that they act as a deterrent to delivering local programming. As AMIC points out, it is far preferable that the Commission refrain from imposing forfeitures for “occasional problems that are likely to occur due to the complex nature of creating accurate captions and preserving their integrity through the entire delivery process.” Comments of AMIC at 4.

In lieu of additional regulation, NAB urges the Commission to retain Congress’ balance, as it has done during the past eight years. As NCTA notes, the Commission’s

¹⁹ In addition, NAB agrees with the Florida Association of Broadcasters (“FAB”) that the FCC should avoid enforcement standards “that would impair the ability of journalists and licensees to make the needed good faith judgment calls required during chaotic and dynamic conditions.” Comments of FAB at 4. Similarly, the Radio and Television News Directors Association (“RTNDA”) notes that the Commission’s “no exceptions” policy of “requiring ‘simultaneous or nearly simultaneous’ presentation of aural and visual critical emergency information ... places broadcasters in untenable situation of withholding information until real-time captioning can be activated or appropriate personnel are in place to prepare visuals”). Comments of RTNDA at 10-11. NAB thus urges the Commission not to deter through forfeitures the dissemination of emergency information.

²⁰ See H.R. Rep. No. 458, 104th Cong., 2d Sess. (1996) at 183 (House Report provided that “the Commission shall balance the need for closed captioned programming against the potential for hindering the development and distribution of programming”).

Reconsideration Order clearly demonstrated sensitivity for technical and inadvertent captioning mistakes. *See* Comments of NCTA at 11. NAB urges the Commission to retain this necessary sensitivity. Additionally, the Commission should focus on encouraging cooperative, non-adversarial relationships between captioners and programming distributors. NAB shares the concerns raised by Caption Colorado that imposing standards for captioning quality may have the unintended consequence of disrupting established business relationships and ultimately diminishing the overall quality of captioned programming. *See* Comments of Caption Colorado at 32-35. NAB therefore agrees with NCRA that the Commission would more effectively improve caption quality standards by working with captioners to establish “best practices” for the captioning community. *See* Comments of NCRA at 4. Because broadcasters and other programming distributors are reliant upon the skills of outside caption companies to create captions, the Commission can best ensure continued improvements in the quality of captioning by focusing on “best practices” and similar voluntary measures by those that create and have control over the accuracy of captions.

IV. Because The Record Demonstrates Both A Shortage Of Real-Time Stenocaptioners And Significant Costs For Captioning News Programming, The FCC Should Not Alter Its Electronic Newsroom Technique Regulations.

In addition encouraging the establishment of “best practices,” NAB also urges the Commission to work with the captioning community to explore ways to reduce the shortage of qualified captioners. Commenters generally agree that there is currently a shortage in the number of real-time stenocaptioners.²¹ And due to competing demands

²¹ *See, e.g.*, Comments of Cosmos Broadcasting Corporation, *et al.* at 4 (estimating the number of stenocaptioners at 500); Comments of NCTA at 14 (citing S. Rep. No. 109-93, 109th Cong. 1st Sess. (June 25, 2005)) (estimating there are currently 300 English language and 6 Spanish language trained real-time captioners); Comments of Media

for captioners' skills, primarily from real-time court and deposition reporting, the number of real-time captioners for video programming may actually be decreasing.²² One commenter even described today's captioning marketplace as "dysfunctional, predatory, and non-competitive." Comments of Media Captioning Services at 3. Additionally, the shortage of real-time captioners (and the costs associated with captioning) may be exacerbated by the advent of digital over-the-air multicasting. *See* Comments of NBC Telemundo License, Inc. at 2.

Because real-time captioning is a skill that requires at least two to four years of training, immediate relief from the shortage is unlikely. NCRA has stated that, although the current federal funding of captioning training has had a positive impact, "it is far from adequate to achieve the graduation rates of reporters that are necessary to meet the demands of the 1996 Telecommunications Act." Comments of NCRA at 10.²³ Indeed, Congress recognizes the pervasiveness of the captioning shortage – in 2005 the Senate proposed legislation, S. 268 - Training For Realtime Writers Act, to remedy this problem through the granting of competitive training grants. NAB thus encourages the Commission to work with the captioning community to explore how additional resources can be directed towards the training of stenocaptioners.

Captioning Services at 6 (estimating there are 625-650 real-time captioners, with 450 captioners working for top 4 firms); Comments of Caption Colorado at 19 (stating that approximately 400 real-time captioners currently provide all real-time captioning in the United States). *See also The Captioning Crisis: A Case for Swift and Decisive Action*, National Court Reporters Association, at 1 (rel. Aug. 22, 2005), found at http://www.ncraonline.org/infonews/press/media_homepage.html.

²² *See* Comments of Caption Colorado at 20; Comments of Media Captioning Services at 17; Comments of National Captioning Institute at 5.

²³ Media Captioning Services notes that passage rates for the California State Certified Shorthand Reporter exam rates has been only 11-22%. Comments of Media Captioning Services at 16.

Given this serious shortage real-time captioners, the Commission should not consider extending the prohibition on the use of Electronic Newsroom Technique (“ENT”) for captioning news beyond the top 25 markets. At this time (and for the foreseeable future), there are simply not sufficient numbers of stenocaptioners available to provide real-time captioning services for every local television station in the United States. *See* Comments of WGBH at 24; Comments of Dana Mulvany, MSW at 5. In fact, given that the number of available captioners is estimated to be between 300 to 650, it is doubtful whether any stations beyond the top 25 markets could even secure real-time stenocaptioning services.

In addition to the stenocaptioner shortage, extending the prohibition on the use of ENT would be extremely burdensome, particularly for broadcasters in small and medium-sized markets who are already struggling to finance the digital transition and suffering declining news revenues. As detailed in our initial comments,²⁴ imposing such burdens may also have the unintended consequence of creating disincentives for local broadcasters to air local news. Many of the broadcast commenters detailed that costs associated with real-time captions for news would be prohibitive. For example, Hubbard Broadcasting explains that for its station WDIO-TV, the annual costs of real-time captioning would exceed \$178,350, representing over 15% of their annual news budget, or the equivalent of seven fulltime news reporters’ salaries. Comments of Hubbard Broadcasting, Inc. at 2-5. And as the RTNDA points out, in small and medium markets “each \$20,000 spent on real-time closed captioning means we lose one news staffer, and

²⁴ *See* Comments of NAB at 6-10.

our coverage suffers.” Comments of RTNDA at 5.²⁵ Extending the ENT prohibition beyond the top 25 markets therefore would likely force small and medium market broadcasters, who lack the resources to provide real-time captioning for news programming, to reduce or even remove local news programming from their schedules. *Id.* at 7.²⁶ This is clearly contrary to the public interest. As Hubbard Broadcasting aptly states: “[d]estroying the economic ability of small market television stations to serve their communities with local programming would harm hearing impaired and all other viewers.” Comments of Hubbard Broadcasting, Inc. at 2.²⁷

The Commission itself has recognized that caption costs could deter local programming. In imposing the ENT prohibition only on the top 25 markets, the Commission specifically stated that a “real-time captioning requirement could impose an economic burden on smaller entities since resources are likely to be limited, costs for real-time captioning remain high and methods for remote real-time captioning are still being developed.” *Reconsideration Order* at ¶ 37. Those economic realities still exist today, exacerbated by declining news revenues and the costs associated with the digital television transition. *See* Comments of NAB at 6-10. And while it recognized that

²⁵ RTNDA estimates that captioning costs on average about \$150 per hour, but can cost a station as much as \$500,000 per year. *See* Comments of RTNDA at 4.

²⁶ NBC Telemundo states that costs of local news may be proving unsustainable. *See* Comments of NBC Telemundo, Inc. at 8 (*citing* Special Factual Submission in Support of Multicast Carriage by the NBC television Affiliates Association, CS Docket Nos. 98-120, 00-96 & 00-2, at 16 (Jan. 8, 2004); Special Factual Submission in Support of Multicast Carriage by the CBS Television Network Affiliates Association, CS Docket Nos. 98-120, 00-96 & 00-2, at 14 & n. 33 (Jan. 13, 2004)).

²⁷ Additionally, NAB concurs with Lincoln Broadcasting Co. that the Commission should retain 47 C.F.R. § 79.1(d)(3) of its rules to ensure that foreign language programming can utilize ENT as a cost-effective means to caption programming. *See* Comments of Lincoln Broadcasting Co. at 4-5 (noting that real-time captions costs for Chinese-language news could exceed \$5700 per hour).

stations using ENT may have some unscripted portions of their newscasts uncaptioned, the Commission balanced this against the cost of live captioning and the absence of a large pool of trained stenocaptioners. It chose to urge stations to script (and therefore caption) additional portions of their news programs, and it committed itself to reexamining this issue in light of station experience and the availability of live captioning services or other new captioning technologies, including voice-recognition software.²⁸ In the intervening years, however, there have not been substantial developments in either captioning technologies or the number of stenocaptioners that justify an altering of this regulatory balance.

Today, many stations outside the top 25 markets rely on ENT to provide captions for local programs. This technology permits them to feed teleprompter or other scripted material into the captioning encoder, substantially reducing the cost of captioning. ENT allows many stations the ability to deliver timely and relevant news programming to the local communities they serve. Much of the programming in local news and public affairs is prepared in advance of airing. Television talent generally adheres to these scripts as they are read through a teleprompter. Thus, the ENT conveys the primary substance of the news broadcast. Additionally, some stations that cannot afford real-time captioning for all the news they produce supplement ENT with live captioning of weather, traffic and late-breaking news.

The effect of extending the prohibition on the use of ENT would be a reduction in the amount of locally produced news and other programming. The detriment to the public of such a result is evident. Given the substantial costs and practical difficulties, as

²⁸ The Commission also opined that during the phase-in of its captioning rules “video programming providers will have sufficient leeway to experiment and use new captioning techniques.” *Id.* at ¶ 42.

well as the limited benefits, NAB urges the Commission to refrain from extending the prohibition on the use of ENT. In this instance, a properly conducted cost/benefit analysis of the proposed regulation, an integral part of agency decision making, would clearly demonstrate that expansion on the prohibition on the use of ENT is imprudent.²⁹

V. The Commission’s Regulations Should Foster The Development Of New Caption Technologies.

In lieu of new costly and burdensome regulatory measures, NAB urges the Commission to work with industry to develop feasible solutions for improved and cost-effective methods of news captioning, including the development of voice-recognition and other technologies. NAB agrees with ENCO Systems that, if technical solutions are to evolve and improve, there must be flexibility within the Commission’s regulations to foster such development. Comments of ENCO Systems, Inc. at 2. Similarly, MPAA echoes the concern that imposing new quality standards could short-circuit technological developments, such as voice-recognition software. Comments of MPAA at 2. NAB also agrees with United States Telecommunications Association (“USTA”) that programming providers have made “tremendous strides” in captioning and that both technological and market developments will continue to improve captioning, without the need for government intrusion. Comments of USTA at 4. Ultimately, technology may offer an

²⁹ The Commission is required to reasonably assess the costs of the agency’s actions. See, e.g., *Motor Vehicle Mfrs. Assn. v. State Farm Mut. Ins.*, 463 U.S. 29, 54 (1983) (agency needs to “look at the costs as well as the benefits” of a regulatory standard); *People of the State of California v. FCC*, 905 F.2d 1217, 1231 (9th Cir. 1990) (reviewing court “must be satisfied that the Commission’s assessment of the various costs and benefits is reasonable in light of the administrative record,” and “if the FCC’s evaluation of any significant element in the cost/benefit analysis lacks record support,” then the court “cannot uphold the agency action” under the Administrative Procedure Act): *United States Telecom Association v. FCC*, 227 F.3d 450, 461 (D.C. Cir. 2000) (finding that FCC’s failure to explain how it implemented provisions of the Communications Assistance for Law Enforcement Act in a “cost-effective” manner was “a classic case of arbitrary and capricious agency action”).

automated, and in-house, closed captioning solution. *See* Comments of Cosmos Broadcasting, *et al.* at 11.

The Commission should ensure that its regulations leave broadcasters with sufficient flexibility to avoid a loss of valuable programming for the public at large while meeting the needs of the hearing-impaired. Establishing specific accuracy benchmarks and onerous monitoring requirements will frustrate the development of such new technologies because broadcasters and other programming providers will be deterred from utilizing new technologies that do not, at the outset, meet such benchmarks. The inevitable result would be delays in improving these new captioning technologies because captioning companies will be less willing to invest in research and development. Moreover, companies that develop other technologies, which, in the future, could be applied to captioning, would be discouraged from entering the captioning market because these new technologies might not initially meet certain accuracy benchmarks. Thus, adopting specific accuracy requirements could have the unintended consequence of stifling captioning innovation entirely.

VI. Conclusion.

For the above-described reasons, NAB supports measures to streamline the captioning complaint process, and encourages the captioning communities' development of "best practices" and ways to alleviate the shortage of real-time stenocaptioners. As many commenters noted, many of the proposed rules governing quality, monitoring and reporting requirements will not lead to improvements in captioning quality. Rather, they impose undue burdens on television broadcasters, particularly in medium and small markets, and could even discourage stations from providing local news and other

programming. Finally, the imposition at this time of extensive accuracy and other captioning standards would likely have counter-productive consequences, such as deterring the development of more cost-effective captioning technology. NAB respectfully submits that the record here does not warrant such a change in agency course.

Respectfully submitted,

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December 16, 2005

Appendix C

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Review of the Emergency Alert System) EB Docket No. 04-296
)

To: The Commission

**COMMENTS IN RESPONSE TO PETITION FOR IMMEDIATE
INTERIM RELIEF**

I. Introduction.

The National Association of Broadcasters (“NAB”)¹ hereby responds to Minority Media and Telecommunications Council, *et al.’s Petition for Immediate Interim Relief*.² NAB agrees with Petitioners that the events surrounding recent natural disasters highlight the need to examine how best to ensure wide dissemination of emergency information. Broadcasters recognize the critical role they play in informing the public of national, state and local emergencies. Through the use of live news coverage and the EAS, broadcasters ensure that the local communities they serve have timely access to critical, and often-life

¹ NAB is a nonprofit, incorporated association of radio and television stations and networks that serves and represents the American broadcasting industry.

² In the Matter of Review of the Emergency Alert System, *Petition for Immediate Interim Relief*, EB Docket No. 04-296, filed Sept. 20, 2005 (“*Petition*”). Pursuant to 47 C.F.R. § 1.45, responses to any Petition filed must be made within 10 days after the original pleading is filed. The Petition, however, did not post on the Commission’s Electronic Comment Filing System (“ECFS”) until the afternoon of October 4, 2005. Thus parties were unaware of the appropriate filing deadline. NAB respectfully requests the Commission accept this response as timely filed. The Commission recently granted similar relief due to delayed ECFS postings in MB Docket No. 05-255.

saving, information. And, broadcasters remain committed to working with federal, state and local officials to explore ways to improve this service.

Petitioners seek revisions to part 11 of the Commission's rules governing the Emergency Alert System ("EAS") to require the dissemination of multilingual local, state and national emergency information.³ While NAB agrees that the goal of *Petition* is laudable, as we explain below, Petitioners' specific proposals raise numerous statutory and practical questions that must be addressed.

II. The Commission's Authority Over Presidential Level Messages And State And Local Plans Is Limited.

The first question to ask is whether the Commission has authority to do what the *Petition* asks. Petitioners urge the Commission to modify its rules to "provide that the 34 PEP stations would air all Presidential level messages in both English and Spanish." *Petition* at 13. The Commission, however, does not possess the authority to mandate the content of Presidential level messages. Rather, the Federal Emergency Management Agency ("FEMA") is "responsible for implementation of the national level activation of EAS, test, and exercises."⁴ Thus, it would appear to be FEMA, in coordination with the Department of Homeland Security and the White House, not the FCC, that can determine that the Presidential level messages will be delivered on a bilingual basis.⁵

³ Current EAS rules provide that EAS announcements may be aired in the same language as the primary language of the station. *See* 47 C.F.R. § 79.2(b)(3).

⁴ In the Matter of Review of the Emergency Alert System, *Notice of Proposed Rule Making*, EB Docket No. 04-296, rel. Aug. 12, 2004 ("*Notice*").

⁵ As the Commission is aware, the EAS system has never been activated intentionally on a national level. The national component of the EAS legacy system was created at a time when the Executive Office did not have adequate access to media outlets. Today, should the President wish to address the nation, there is nearly-instantaneous access to a multiplicity of media sources. For this reason, it would seem that this aspect of the *Petition* is not critical at this time.

A similar question must be asked with regard to Petitioners' request that the FCC to modify its rules to include a Local Primary Spanish ("LP-S") station designation and "provide that state and local EAS plans would designate an LP-S station in each of the local areas in which an LP-1 has been designated." *Petition* at 14.⁶ While the Commission can require the creation of additional and specialized LP stations, it lacks statutory authority to require non-licensees, including local, state and federal entities, to either (1) develop emergency plans to implement these new LP stations or (2) require that emergency information be distributed in Spanish or other languages. The Commission's authority extends only to requiring that, once created, state and local plans be reviewed and approved by the Director of the Office of Homeland Security, Enforcement Bureau, prior to implementation consistency with national plans, Commission regulations, and EAS operation. *See* 47 C.F.R. § 11.21.

In contrast, FEMA has direct authority over state and local emergency funding, and would appear to be the government agency best suited to ensure that all state and local governments are fully implementing state and local emergency plans. Under the Stafford Act, the President can:

...establish a program to provide technical and financial assistance to States and local governments to assist in the implementation of predisaster hazard mitigation measures that are cost-effective and are designed to reduce injuries, loss of life, and damage and destruction of property, including damage to critical services and facilities under the jurisdiction of the States and local governments.

Effective Oct. 30, 2000. 42 U.S.C. § 68.

⁶ In addition, Petitioners propose that for each radio market having a population of a language minority of either 50,000 or 5% of the total market population, the Commission modify its rules so that state and local plans may designate a Local Primary Multilingual ("LP-M") station. *Petition* at 15.

Thus, through existing legislation, such as the Stafford Act, FEMA is already authorized to assist state and local governments in developing emergency plans, including means by which non-English speaking persons can be appropriately warned.⁷ Obviously state and local emergency governments must receive adequate funding and strong federal guidance to ensure that all jurisdictions are able to meet the public warning needs and first responder's needs of their communities, for both English and Non-English speakers alike. NAB urges Petitioners to work with FEMA and broadcasters to explore these issues further.

III. Petitioners Raises A Number Of Issues That Require Further Consideration.

The *Petition* also raises a number of practical issues that warrant further and careful consideration by the Commission. For example, Petitioners propose that the Commission amend 47 C.F.R. § 11.52(d) to provide that “at least one broadcast station in every market would monitor and rebroadcast emergency information carried by local LP-S and LP-M stations.” *Petition* at 15. The *Petition* does not, however, explain how such a rule would be implemented. To note just one practical problem, the LP-S and LP-M designated stations, however, may be sited in different areas, and thus, it may not be possible (due to intervening terrain or signal obstruction) for a station to monitor multiple stations.

Nor is it apparent that a single-monitoring designee would appropriately reach the intended audience. How, for example, would non-English speaking listeners in a given

⁷ In the same year the Stafford Act was passed, the Executive Office also recognized that future objectives of EAS were “completing development of all State and local EAS plans” and “developing EAS educational and training packages for government and industry personnel.” *Effective Disaster Warnings, Report by the Working Group on Natural Disaster Information Systems Subcommittee on Natural Disaster Reduction,*

radio market be alerted if they are not tuned into the one “designated” monitoring station? What if the monitoring station is located in an area (*e.g.*, San Francisco or New York) where there are speakers of multiple languages that currently listen to diverse radio formats? To which channel(s) should these listeners be redirected?

NAB suggests that rather than rush to a rule without knowing how it can be implemented, it would be better to carefully consider how non-English speaking persons are currently receiving their information, including emergency information provided on non-English broadcast channels, to ensure that a public warning system designed to reach non-English speakers effectively reaches its intended audience.

NAB also suggests that Petitioners’ proposal that the Commission modify 47 C.F.R. § 11.52(d) to specify that, if a local LP-S or LP-M station “loses its transmission capability, stations remaining on the air should broadcast emergency information in the affected languages (at least as part of their broadcasts) until the affected LP-S or LP-M station is restored to the air”⁸ must be thought through. It is unclear, for example, how the “remaining” stations (aside from the theoretical one “monitoring” station) would be able to determine whether the LP-S or LP-M station had lost transmission and when transmission had been restored. Moreover, Petitioners do not articulate precisely how the remaining stations would transmit non-English state and local emergency information or define what constitutes “at least as part of their broadcasts.” Petitioners apparently assume that the LP-S and LP-M stations would originate non-English EAS warnings. But if the LP-S and LP-M stations are non-operational, it is not clear how this can be accomplished. If the LP-S or LP-M station is off-air, how would they receive non-

National Science and Technology Council Committee on Environment and Natural Resources, Nov. 2000 at 29.

English EAS transmissions? From the LP-1 stations, from state and local “emergency operations centers,” or from another source? In sum, the Petition does not provide sufficient information upon which the Commission could effectively implement the requested relief.

IV. Conclusion.

For the above-described reasons, NAB has supported in the past and continues to support various efforts to improve EAS, including means by which all persons can be effectively alerted. The Commission should continue to consider the issues raised by the *Petition*. NAB looks forward to a continued dialogue exploring how local, state and federal agencies, through the voluntary cooperation of broadcasters, can better serve non-English speaking persons.

Respectfully submitted,

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⁸ *Petition* at 15.