

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

In the Matter of)
)
Amendment of Sections 73.3526 and 73.3527) RM-11332
of the Commission's Rules (the Public File))
)

To: The Secretary, for RM-11332, and
Forwarding to Chief, Media Bureau

COMMENTS OF FAMILY STATIONS, INC.

Family Stations, Inc. ("FSI") files the following Comments in support of the Petition for Rule Making filed by David Tillotson, Esquire ("Petitioner") requesting that the Commission initiate a formal Rule Making proceeding whether to delete or, at least, modify substantially the public inspection file rules (Section 73.3526 for commercial stations and 73.3527 for noncommercial licensees). FSI urges the Commission to eliminate these rules or at least dramatically modify and simplify them since they are not used by the public for their intended purpose. Rather, they have developed into complicated and unnecessarily detailed regulations that generate revenue for the government through fines for minor infractions without enlightening the public about broadcast station operations.

1. FSI does not quarrel with the overall goal of the rules to help the public to learn certain information about their local broadcast stations. However, the public file rules are simply not used for this purpose. FSI is a non-profit California corporation that has been the licensee of noncommercial, education broadcast stations, primarily FM radio facilities, since 1959. At present,

FSI is the licensee of fifty-five NCE radio stations, numerous FM translator stations and three NCE television station.

2. Peggy Renschler, Compliance Coordinator, has been associated with FSI since 1973. For almost 20 years, she has been the FSI employee with primary responsibility for oversight of the FSI stations' public files, and making sure those files are maintained in compliance with the Commission rules. She has lectured members of the California broadcasters association on compliance with those rules and is extremely knowledgeable about them. Ms. Renschler personally checked with all of the local FSI station managers and confirms that in the past ten (10) years no member of the public has looked at any station's public file. In fact, the only individuals to inspect any FSI station's public file during that time were FCC inspectors on six occasions.

3. Nevertheless, Ms. Renschler estimates that she personally spends 4 - 10 hours per month on making sure the public files for all of the FSI stations are in order and in compliance with the FCC rules. In addition, she estimates that each local manager spends about one hour per month doing the same thing at the local level. Despite all this time and effort and the public does not use the rules to examine broadcast station performance. There is no value in retaining rules that do not serve their intended purpose or simply are not used.

4. FSI understands that the broadcast airways are owned by the public and that it and all broadcasters are permitted to use those frequencies for limited periods. To the extent that members of the public, as distinct from the FCC or other licensees, want to know about the operations of local stations, the public file rules are not used or useful. The rules impose unnecessary burdens on broadcast licensees without any real benefit to the public.

Therefore, for the reasons set forth herein and in the Tillotson Petition, FSI supports the start of a formal proceeding to determine whether to eliminate or substantially modify the local public inspection file rules.

Respectfully submitted,



Alan C. Campbell
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June 19, 2006

Declaration

I, Peggy Renschler, declare under penalty of perjury that I am the Compliance Coordinator of Family Stations, Inc. I have read the foregoing Comments of Family Stations, Inc. The facts set forth therein are true and correct to the best of my knowledge, information and belief.

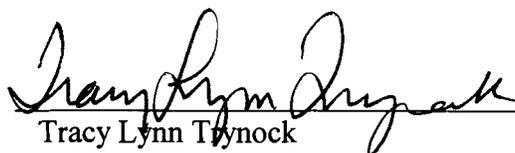


Peggy Renschler
Compliance Coordinator

CERTIFICATE OF SERVICE

I, Tracy Lynn Trynock, do hereby certify that that I have, this 19th day of June, 2006, caused to be sent by first class United States mail, postage prepaid, copies of the foregoing *Comments of Family Stations, Inc.* to the following persons:

David Tillotson, Esq.
Law Office of David Tillotson
4606 Charleston Terrace, N.W.
Washington, D.C. 20007


Tracy Lynn Trynock