Sandralyn Bailey

From: Cary D. Pall [carypall@sbcglobal.net]
Sent: Thursday, July 27, 2006 2:24 PM
To: *KJMWEB*
Cc: Michael Copps; Jonathan Adelstein; dtaylorweb@fcc.gov; Robert McDowell
Subject: Re: Docket 06-121 Comments in re: Media Consolidation

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July 27, 2006

Kevin J. Martin, Chairman
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Mr. Martin:

Thank you for entertaining comments from the public re the question of media consolidation. I am a 35 year veteran of the radio programming and operations industry; you can learn more about my work by visiting the website listed above.

It is my opinion that we have, at our peril, allowed the concentration of power in our nation to accumulate to a small group of very rich people who are not beholden to the ideals our forefathers struggled to give us. Media conolidation is the icing on that cake.

The same people who keep our presidents under guard also control the flow of our money, the flow of illegal drugs, the flow of arms. They pull the strings of business. Through the activities of business-backed lobbyists, they exert influence over our elected officials in Congress. Many of those in control are not citizens of the United States and are using their power to subvert the soverignty of our country. Yet, we continue to allow them to operate freely, controlling our treasury, and, by extension, our country. They are the true power holders. They are the descendents of the same people we fought the American Revolution to free ourselves from.

Prior to 1981, we the people could, at least, be secure that these powerful people could not control our media. Concentration of ownership was not allowed, thanks in part to the efforts of your predecessors. The American

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broadcasting establishment was ultimately controlled by thousands of independent American broadcasters. During my lifetime, I've watched as the power elite have slowly, stealthily usurped this control from the American people.

Not long ago, the same company that produced a television program was not allowed to own the communications pipeline that delivered that program to the public and vice versa. Today, not only are they allowed to own the distribution system, they don't even have to be American citizens. Vivendi, a French corporation, owns Universal Studios, several cable television channels, and now, NBC. So, a foreign corporation now controls one of the country's largest suppliers of programming from conception to delivery, and they control the licenses of several local television outlets as a sideline. That can't bode well for the future of local service, or service that puts America first, for that matter.

I spent three years working inside the Clear Channel group as a mid-management official. Local service is not the priority of that company, I can assure you. On several occasions, national corporate initiatives stood directly in the way of decision-making that would have served our local community. Last time I checked, the licensee serves "the public interest, as a public trustee". When the wants of some egotistical programming executive take precedent over doing the right thing for the local community, something is very, very wrong.

The "seven-seven-seven" rule of the past was certainly overprotective. However, the structure of Clear Channel, where one man oversees over 200 radio stations and is a *regional* middle manager, can't bode well for effective oversight.

Were someone to ask what I would propose, it would be the following.

First, return control of all American media companies to American companies and citizens. Include program suppliers as well as licensees. We are not one world, and we need to protect our soverignty from those who would kill us.

Second, return to the principle that program suppliers are kept separate from networks and distribution systems, so that no one group can gain too much control.

Third, return to the principle that newspaper owners must be kept separate from television and radio ownership, but allow each to develop internet presences with no restriction. This ensures diversity of voices.

Fourth, cap local market ownership of radio and television to no more than 20 percent of the market as measured by *signal coverage* over the SMSA as opposed to audience measurement or billing. This way, smaller stations can be combined together to compete more effectively with grandfathered stations that are allowed higher power. Use the city-grade contours as the baseline, then add the total square mileage covered by all of the licensed signals in the SMSA to determine percentages.

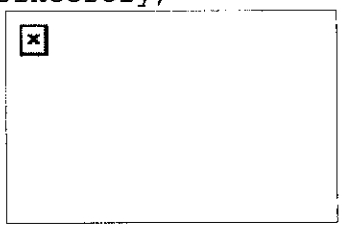
Fifth, allow no owner to hold more than 150 radio properties, or 20 television properties, to ensure proper oversight and guarantee that no one

company can exert undue control over national voice.

Since the Telecommunications Act of 1996, diversity of voice has all but disappeared in America. This is a national tragedy that you, as patriots, and as public officials with a measure of power, can repair.

Thank you for your consideration.

Sincerely,



Cary D. Pall

CC: Michael Copps, Commissioner
Jonathan S. Adelstein, Commissioner
Deborah Taylor, Commissioner
Robert McDowell, Commissioner