

Re: MM Docket No. 93-8 (Public interest status of home shopping stations and their right to cable carriage)

To the Commission

While I understand the value that home shopping and other program length commercial programming has played in maintaining the economic viability of small, undercapitalized, and minority-owned stations, I must respectfully disagree with the conclusion that this type of programming sufficiently serves the public interest to warrant mandatory carriage by cable systems.

Frankly, I fail to see how any service to the public interest is served by these stations when they essentially "plug into" a national home shopping feed, breaking for only a few hours a week in order to carry required children's programming. These stations typically do no local promotion, carry little (if any) local interest programming, and have no local identity. Most cable viewers would probably not even realize that these are local stations, but instead assume that these channels are just one more cable home shopping service.

In order to warrant mandatory carriage on cable systems, these stations should be required to do something to serve the public interest. The requirement should be a percentage of non-paid programming that is locally scheduled and/or a percentage of locally produced non-paid programming. For example, a station might qualify for must carry status if the station originates at least 10% of its programming locally per week or if its schedule includes at least 1/3 (33%) non-paid programming. This compromise would ensure that financially marginal stations would continue to enjoy substantial revenue from paid programming and/or home shopping, while still requiring these stations to provide some additional programming to demonstrate that they are serving the public interest.

Respectfully submitted,

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