

To Chairman Martin and Commissioners Copps, Adelstein, Tate, and McDowell:

The Community Broadcasters Association is disturbed about press reports that at its meeting next week, the Commission's Report on Broadcast Localism and Notice of Proposed Rulemaking. (MB Docket No. 04-233) to be voted on next week may include proposals to require formal needs ascertainment in the community, more detailed public file documents, and quarterly reports filed with the FCC.

CBA represents the nation's Class A TV stations, which are the only stations required by statute to broadcast local programming -- an average of three hours a week. CBA has always supported localism of all kinds, including local programming, and we continue to believe in the high value of local programming and all aspects of localism. However, there is a big difference between local programming and local paper work. Introducing more formalistic requirements and more paper work will be a serious burden on the small businesses that operate Class A stations. All it will do is to divert human resources from creating and producing local programming to creating and producing paper work.

Our stations should be judged on the programming they broadcast, not on the paper they generate. Members of the public who want to judge our stations should watch their programs, not review their papers. People who just review paper work are not getting the benefit of our local programs, so they should not be heard to complain about those programs.

CBA will always continue to support localism and local programming as a bedrock value in American broadcasting. However, we will strongly oppose exercises in paper work that will burden our industry and make it more difficult for us to fulfill primary mission of providing programming to the public.

Sincerely,

Ronald J. Bruno, President

tvirjb@aol.com

412-921-7577