



Marsha J. MacBride

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December 17, 2007

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: MB Docket No. 04-233

Dear Secretary Dortch:

On Friday, December 14, 2007, broadcasters from across the United States contacted the Commissioners' offices to tell them how broadcasters are serving their local communities every day. Amplifying arguments previously presented by the National Association of Broadcasters, station representatives explained once again that local broadcasters take their responsibility to serve the public interest very seriously. They are concerned that burdensome prescriptions from Washington regarding how broadcasters should determine community needs and what types of programming will serve their community will undermine rather than enhance their ability to serve local audiences.

The attached communications, which were shared with the NAB, typify the contacts. Each broadcaster told their own story and urged the Commission not to reimpose burdensome regulation that the Commission wisely eliminated more than 25 years ago.

Sincerely,

A handwritten signature in cursive script that reads "Marsha J. MacBride".

Marsha J. MacBride

cc: The Honorable Kevin J. Martin
The Honorable Michael J. Copps
The Honorable Jonathan S. Adelstein
The Honorable Deborah Taylor Tate
The Honorable Robert M. McDowell

MacBride, Marsha

From: Rehr, David K.
Sent: Friday, December 14, 2007 5:02 PM
To: MacBride, Marsha
Subject: FW: NPRM - LOCALISM MANDATES
Importance: High

From: Robert C. Savage [mailto:savage@wysl1040.com]
Sent: Friday, December 14, 2007 3:18 PM
To: Kevin.Martin@fcc.gov; jonathan.adelstein@fcc.gov; michael.copps@fcc.gov; deborah.tate@fcc.gov; robertmcdowell@fcc.gov
Cc: J. C. DeLass; Judith Anne Day; Scott Fybush; Bob Stone; Rehr, David K.
Subject: NPRM - LOCALISM MANDATES
Importance: High

TO THE FEDERAL COMMUNICATIONS COMMISSION: **URGENT RE:**

NOTICE OF PROPOSED RULEMAKING – LOCALISM AND PROGRAMMING REPORTING REQUIREMENTS

Lady and gentlemen of the Commission:

It is our understanding that the FCC proposes to reinstate program reporting requirements eliminated almost a generation ago and mandating the establishment of community advisory boards for radio stations. Radio Livingston Limited, licensee of WYSL, Avon, New York, would like to go on record as opposing this proposal.

WYSL has served its community of license – Avon, New York – for almost 21 years. We are continually in touch with our listeners and community leaders from all professions and walks of life, many of whom regularly appear on WYSL. Some host weekly live talk shows. We even had a Justice of the New York Court of Appeals who did color announcing for local high school basketball games. Under 21 years of continuous licensee ownership and operation, we feel that our station is most responsive to the needs of our home community and region with all WYSL programming.

Listeners not only call, write and e-mail with responses to our programming – in almost every instance they get a personal response from WYSL owners, whether the comments are positive or negative. We get plenty of feedback from the public.

This it can readily be seen that a “community advisory board” would be a needless bureaucratic burden and obstacle in the operation of WYSL, and superfluous to boot. So also would be program “reporting” requirements beyond the Public File Programs-and-Issues report filed quarterly.

Having been in radio broadcasting for almost 41 years, I believe that my personal experience with “program reporting requirements” dates back to when these were ongoing FCC requirements along with similarly burdensome recordkeeping about financial transactions, detailed program log maintenance and so forth. With all due respect my personal experience with this former regulatory burden predates the Chairman’s and Commissioners’ experience with radio.

I can confidently tell you that all this kind of recordkeeping red tape does nothing to enhance public service. It just propels licensees to crank out meaningless boilerplate reports to stuff in file cabinets to satisfy government regulators.

I strongly urge the FCC to avoid reimposition of needless burdens on radio.

Robert C. Savage, Pres/CEO
WYSL NewsPower 1040
Avon, NY 14414

(585) 346-3000
Savage@wysl1040.com

MacBride, Marsha

From: Rehr, David K.
Sent: Friday, December 14, 2007 5:02 PM
To: MacBride, Marsha
Subject: FW: localism NPRN

-----Original Message-----

From: Al Bramstedt [mailto:bramstedt@ktuu.com]
Sent: Friday, December 14, 2007 3:23 PM
To: Kevin.Martin@fcc.gov; Jonathan.Adelstein@fcc.gov; Michael.Copps@fcc.gov; Deborah.Tate@fcc.gov; Robert.McDowell@fcc.gov
Cc: STATE-AK Simono, Darlene; Rehr, David K.; gzaser@zandl.com; lance.hankins@ktuu.com
Subject: localism NPRN

Dear Chairman Martin,
Commissioner Adelstein
Commissioner Copps
Commissioner Tate
Commissioner McDowell

It has been brought to my attention that the FCC is considering a rulemaking, announced at your Dec.18 meeting, that will, in the words of the NAB, "turn back the clock and re-regulate local broadcasters." As the Manager of Channel 2 in Anchorage, Alaska since May of '76, I recall those regulations of that era. We do not want nor need the return of these burdensome regulations. They added to our administrative work load while not resulting in increased local service. The burden of these past regulations, I hold, decreased our ability to serve our communities as we were doing paperwork instead of using that time to do more good work in our community.

I urge you to not return these needless regulations of the television broadcast industry.

Regards,

Al Bramstedt

General Manager

KTUU-TV

Anchorage, Alaska

MacBride, Marsha

From: Rehr, David K.
Sent: Friday, December 14, 2007 5:01 PM
To: MacBride, Marsha
Subject: FW: Proposed Rulemaking at your Tuesday 12/18 meeting
Importance: High

From: Paul Cameron [mailto:pcameron@christianfamilyradio.net]
Sent: Friday, December 14, 2007 3:39 PM
To: Rehr, David K.
Subject: Fw: Proposed Rulemaking at your Tuesday 12/18 meeting
Importance: High

Dear David;
 Here is what I sent to the FCC. Need I call as well?

Paul Cameron
 Executive Director & General Manager
 Christian Family Radio--Helping Families Build Healthy Relationships
 920-749-9364 ext. 24
 1909 W. Second St. Appleton, WI. 54914
 WEMI 91.9 Appleton/Oshkosh, 101.7 Fond du Lac, 101.7 Ripon, 107.3 Waupaca
 WEMY 91.5 Green Bay, 95.5 Two Rivers/Manitowoc
 WGNV 88.5 Wausau/Stevens Point & 94.1 Antigo
 Streaming website: <http://www.ChristianFamilyRadio.net>

----- Original Message -----

From: Paul Cameron
To: Kevin.Martin@fcc.gov
Cc: Michael.Copps@fcc.gov ; Jonathan.Adelstein@fcc.gov ; Deborah.Tate@fcc.gov ; Robert.McDowell@fcc.gov
Sent: Friday, December 14, 2007 2:09 PM
Subject: Proposed Rulemaking at your Tuesday 12/18 meeting

Dear Chairman Martin and Commissioners Copps, Adelstein, Tate and McDowell;

First let me thank you for your hard work in a rapidly changing arena and for the opportunity to hear what I have to say this afternoon.

I do not often write to the FCC, however I have chosen to do so in light of your upcoming Tuesday 12/18 meeting at which you are looking to propose additional rules for stations such as the ones I oversee.

It is my understanding in that in your efforts to look at localism, you are looking to reinstate programming and reporting requirements that were thankfully removed more than 25 years ago. As someone who has been with our group of stations since 1981, the less the additional paperwork and red tape, the more time that we have as a group of stations to maintain our live and local focus of broadcasting.

While I understand the idea of community advisory boards, we find that there is only so much time in the day for our team as well as those in the communities in which we serve. Instead of this motivating us to do more, it is just another added burden for an already short staffed organization. I am sure that there are others in the same boat as we are and I pray that they speak out.

I am also very alarmed about additional possibilities that you may require us to provide data about music aired, local music and how our playlists are developed and used. Again, more work and let time to work on our live and local focus.

I ask that you might seriously reconsider not moving forward with any of these recommendations, but rather table it and deal with other major issues that the FCC has before them. That additional regulations are just going to hinder & harm our efforts rather than strengthen and solidify the work we are doing.

Our stations serve our local communities every day. How many stations encourage their staffs to pray for their listeners and communities, or for that matter ask their listeners for prayer requests.

In closing, please do not go back to what we have come from and re-regulate our local stations.

May the Lord bless and keep you and I am looking forward to hearing from you as you have time.

Paul Cameron
Executive Director & General Manager
Christian Family Radio--Helping Families Build Healthy Relationships
920-749-9364 ext. 24
1909 W. Second St. Appleton, WI. 54914
WEMI 91.9 Appleton/Oshkosh, 101.7 Fond du Lac, 101.7 Ripon, 107.3 Waupaca
WEMY 91.5 Green Bay, 95.5 Two Rivers/Manitowoc
WGNV 88.5 Wausau/Stevens Point & 94.1 Antigo
Streaming website: <http://www.ChristianFamilyRadio.net>

MacBride, Marsha

From: Rehr, David K.
Sent: Friday, December 14, 2007 5:01 PM
To: MacBride, Marsha
Subject: FW: Report on Broadcast Localism and Notice of Proposed Rulemaking

From: Trey Stafford [mailto:trey@triplefm.com]
Sent: Friday, December 14, 2007 3:38 PM
To: BOARDChristian, Ed; Rehr, David K.
Subject: FW: Report on Broadcast Localism and Notice of Proposed Rulemaking

From: Trey Stafford [mailto:trey@triplefm.com]
Sent: Friday, December 14, 2007 2:38 PM
To: 'Robert.McDowell@fcc.gov'
Subject: Report on Broadcast Localism and Notice of Proposed Rulemaking

Commissioner McDowell:

It is with great respect that I plead to you and your colleagues to turn away from the notion of additional requirements by broadcasters to be “local” and “serve their communities” as is being discussed in the coming days.

When I was in elementary school, routinely the entire class was punished for the actions of a few. A few kids would act up, so the entire class couldn't go outside at recess. A couple of kids get loud on the bus, so the whole group has to shut up. It seemed like that scenario happened over and over when I was a kid. Me and most of the kids would do the right thing, make the right choices, but would end up being punished because of the actions of a few.

Well, let me tell you, I am sick of that. At 46 years old, having 37 years in this business (yes, I started at 9 years old), having dedicated my life and my career to the notion of “serving my community” as an operator and an owner, I am sick of being punished because of the actions of a few. And the idea that we would “turn back the clock” of regulation, and bring back regulations from the past, absolutely makes me sick and embarrasses me as a broadcaster. A lifelong broadcaster.

The proposed changes to rules allowing unmanned operations have been prompted by actions of irresponsible broadcasters. Responsible broadcasters would never let something like that happen in the communities that we serve, and it angers me that my Commission is proposing to

punish me for the actions of irresponsible broadcasters when my company has bent over backwards to take steps to insure that our communities are protected even when our stations are unmanned. Not because we had to do it, but because we are broadcasters who have been brought up and taught that it is our responsibility to operate our stations in such a manner.

In our market, for example, severe weather is the number one cause for crisis. For that reason, competition drives our company to do whatever is necessary to make sure we are on the air first with severe weather information, no matter what time of day it is, and whether we are manned or not. Our public benefits from that.

Here are examples of some of the steps we have taken.

1. Our "A String" talent is on an "on-call" rotation of being responsible for initiating our severe weather coverage during unmanned time periods. It is the responsibility of the on-call talent to monitor the weather, anticipate and foresee severe weather events, and make sure that our stations are in position to broadcast severe weather information promptly by either being at the station personally, or making sure someone else is.
2. As a back-up to that system, our chief engineer has designed a system at the home of our general manager that allows the GM to control all three stations audio either separately or simultaneously and using a remote pick-up transmitter to broadcast audio from his home. He utilizes internet and other technology to monitor and receive severe weather information. On more than one occasion, at all hours, this system has either played the entire role during a severe weather event, or it has "bought time" to allow coverage until personnel can arrive at the station.

Has this system been successful? On more than one occasion, our stations were able to more than adequately serve our listeners with proper information during a severe weather crisis. On one such occasion, April 3, 2006, a super cell thunderstorm produced a long-lasting tornado that left a path of destruction across a three-county area of our coverage area. The tornado practically destroyed the town of Marmaduke, Arkansas. Yet, there was not one death or serious injury from the storm. Remembering the storm a year later, Marmaduke's Chief of Police, Steve Franks, was quoted on the front page of the Jonesboro Sun newspaper. *As the two left Marmaduke, Franks turned on his truck radio and heard Jonesboro announcer Trey Stafford talking about storms being tracked across North Arkansas. Stafford said the storm system seemed to him to be heading for the Marmaduke area.* Payoff for a radio station group committed to severe weather coverage.

We also realize that severe weather is not the only crisis or civil emergency that a town can face. For that reason, we notify, on a quarterly basis, all civil decision makers on communities that we serve our very latest critical staff phone list that provides all emergency contact numbers for our staff. This list includes the 911 coordinators, police and sheriff departments, county judge, office of emergency services, etc. Any person who might need to contact our stations, or use our stations for emergency communications, during an emergency situation.

Emergency decision makers have contacted us regularly to help them get critical announcements on the air. Examples include an evacuation in Bay, Arkansas for a gas leak; overpasses closed on major arteries in Jonesboro during an unexpected ice-up; major arteries closed during a recent brush fire in South Jonesboro. In each case, the decision makers were able to easily contact our station personnel, and we were able to immediately respond by getting the information on the air.

The point is... responsible broadcasters are just that. Responsible. We take seriously our job of serving our communities. We were raised and trained by responsible broadcasters in a different time.

If the FCC believes that some communities are at-risk because broadcasters serving those communities are not performing, then let the FCC deal with those broadcasters. Don't penalize those of us who are responsible by putting the financial burden of full-time staffing to cure a problem that isn't a problem for us.



Trey Stafford
President/General Manager
Triple FM Radio Group
KDXY-FM KEGI-FM KJBX-FM
314 Union
Jonesboro, AR 72401
Phone (870) 933-8800 x12
Fax (870) 933-0403



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MacBride, Marsha

From: David, John
Sent: Friday, December 14, 2007 4:58 PM
To: Mago, Jane; MacBride, Marsha
Subject: FW: Report on Broadcast Localism and NPRM
Importance: High

----- Original Message -----

From: Ron Covert
To: Kevin.Martin@fcc.gov ; Jonathan.Adelstein@fcc.gov ; Michael.Copps@fcc.gov ; Deborah.Tate@fcc.gov ; Robert.McDowell@fcc.gov
Cc: 'Jerry Zimmer'
Sent: Friday, December 14, 2007 3:01 PM
Subject: Report on Broadcast Localism and NPRM

Commissioners,

I would like to respectfully voice opposition to the upcoming Broadcast Localism NPRM . As broadcasters, we strive to super serve our local communities. This is the primary way that we are able to compete with the new media such as satellite radio, internet, i-pods, etc.

More time and money invested in compliance will hinder our ability to deliver the local services that we are trying to provide and make it much more difficult to compete with the other "non-regulated" new media. Please do not turn back the clocks by re-regulating broadcasters and our community efforts.

Sincerely,

Ron Covert

VP / GM Great Plains Media

Lazer 1059 / KLWN / X929 / The Hawksheet

Ears Audio Signage

MacBride, Marsha

From: Rehr, David K.
Sent: Friday, December 14, 2007 4:54 PM
To: MacBride, Marsha
Subject: FW: Please do not impose new burdensome regulations on Local Broadcasters

From: Jerry Lee [mailto:JerryL@101-fm.com]
Sent: Friday, December 14, 2007 3:46 PM
To: Kevin.Martin@fcc.gov
Subject: Please do not impose new burdensome regulations on Local Broadcasters

Dear Chairman Martin,

Radio is not keeping up with inflation.
Radio revenues are being siphoned off by the Internet.
Establishing Community Advisory Boards does nothing to improve the service of Radio Stations to the Community.
We went through that exercise many years ago.
Trying to get Radio stations to air new music from local artists will do nothing but hurt our audiences. People only want to hear songs that they like.
Every month we test 25 new songs out of the hundred's that we are sent each month by the record industry. When ever a local artist sends us a song, we test it.
If the public likes it, we play it. This proposals smacks of what they have done in Canada that has proven to be a disaster. A large percent of the songs play on Canadian Radio have to be with Canadian content. This effort has produced an inferior product. Do you want to be responsible for delivering a inferior Radio product in the U.S.?

Broadcasters are for the most part doing an excellent job of serving their communities.
Let's not try to fix something that isn't broken.

Sincerely,

Jerry Lee
Owner
WBEB
Philadelphia, Pa

MacBride, Marsha

From: Rehr, David K.
Sent: Friday, December 14, 2007 4:52 PM
To: MacBride, Marsha
Subject: FW: Please do not impose new burdensome regulations on Local Broadcasters

From: Jerry Lee [mailto:JerryL@101-fm.com]
Sent: Friday, December 14, 2007 3:59 PM
To: Deborah.Tate@fcc.gov
Subject: Please do not impose new burdensome regulations on Local Broadcasters

Dear Commissioner Tate,

Radio is not keeping up with inflation.
Radio revenues are being siphoned off by the Internet.
Establishing Community Advisory Boards does nothing to improve the service of Radio Stations to the Community.
We went through that exercise many years ago.
Trying to get Radio stations to air new music from local artists will do nothing but hurt our audiences. People only want to hear songs that they like.
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Let's not try to fix something that isn't broken.

Sincerely,

Jerry Lee
Owner
WBEB
Philadelphia, Pa

MacBride, Marsha

From: Rehr, David K.
Sent: Friday, December 14, 2007 4:50 PM
To: MacBride, Marsha
Subject: FW: Localism Proposal

From: East Arkansas Broadcasters [mailto:radiokwyn@cablelynx.com]
Sent: Friday, December 14, 2007 4:05 PM
To: kevin.martin@fcc.gov; jonathan.adelstein@fcc.gov; michael.copps@fcc.gov; deborah.tate@fcc.gov; robert.mcdowell@fcc.gov
Cc: Rehr, David K.
Subject: Localism Proposal

Dear Chairman Martin and FCC Commissioners,

It is my understanding that you are considering reinstating programming and reporting requirements that will hamper the amount of local coverage local radio stations will be able to provide. Most local rural radio stations will not be able to do the local job they have been doing if you were to do this. Please don't eliminate this previous local service now being provided.

Stations like KWYN AM/FM have been the heart of communities such as Wynne, Arkansas and future regulatory burden would undermine the great job we do.

Respectfully,
Bobby Caldwell
Owner/CEO
East Arkansas Broadcasters

MacBride, Marsha

From: Rehr, David K.
Sent: Friday, December 14, 2007 4:49 PM
To: MacBride, Marsha
Subject: FW: FCC Regulations

From: G. Harold Wright [mailto:ghw@wrightwradio.com]
Sent: Friday, December 14, 2007 4:32 PM
To: kjmweb@fcc.gov
Cc: Rehr, David K.
Subject: FCC Regulations

Dear Sir,

I am writing in response to the possibility of the additional FCC regulations you are considering for Radio Broadcasters. **Regulations will only further hamper the small market broadcaster from doing the very thing you seek to facilitate.** I have been a small market broadcaster for 30+ years. One thing I can attest, regulations do not make for a public service oriented radio broadcaster. We work hard every day to provide a quality community minded facility...not because of government regulations...but because the public demands it. We listen everyday to concerns of our community and then work to adapt those demands to our daily programs. The quality of our programming today...is much better than it was during the time of program regulations of the 60's, 70's, and early 80's.

It's important to remember that the stations providing programs to meet the public interest are not doing it because of regulations but because it's what the public demands and it's the right thing to do. The stations that don't do it now...won't do it if even if the FCC implements additional regulations. You can say...we will make them! That sounds good but in reality it's not practical.

I can also tell you from personal experience...that it's harder than ever in today's competitive environment to get listeners, sell enough advertising, pay taxes, and meet government regulations to stay in business...adding to regulations will only create a greater burden....and literally run some stations out of business. I am very proud of my facility and what we are doing to meet our public interest needs...I would challenge anyone to do a better job with or without additional government regulations.

Sincerely,

Harold Wright

KWEY AM/FM
 KCDL FM
 KCLI AM
harold@wrightwradio.com
 President/CEO
 Wright Wradio
 PO Box 587
 Weatherford, OK 73096

Phone 580-772-5939
 Mobile 580-774-7713
 Fax 580-772-1590

MacBride, Marsha

From: Rehr, David K.
Sent: Friday, December 14, 2007 4:50 PM
To: MacBride, Marsha
Subject: FW: Localism Proposal

From: East Arkansas Broadcasters [mailto:radiokwyn@cablelynx.com]
Sent: Friday, December 14, 2007 4:05 PM
To: kevin.martin@fcc.gov; jonathan.adelstein@fcc.gov; michael.copps@fcc.gov; deborah.tate@fcc.gov; robert.mcdowell@fcc.gov
Cc: Rehr, David K.
Subject: Localism Proposal

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It is my understanding that you are considering reinstating programming and reporting requirements that will hamper the amount of local coverage local radio stations will be able to provide. Most local rural radio stations will not be able to do the local job they have been doing if you were to do this. Please don't eliminate this previous local service now being provided.

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Respectfully,
Bobby Caldwell
Owner/CEO
East Arkansas Broadcasters

MacBride, Marsha

From: Rehr, David K.
Sent: Friday, December 14, 2007 4:49 PM
To: MacBride, Marsha
Subject: FW: FCC Regulations

From: G. Harold Wright [mailto:ghw@wrightwradio.com]
Sent: Friday, December 14, 2007 4:32 PM
To: kjmweb@fcc.gov
Cc: Rehr, David K.
Subject: FCC Regulations

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Sincerely,

Harold Wright

KWEY AM/FM
 KCDL FM
 KCLI AM
harold@wrightwradio.com
 President/CEO
 Wright Wradio
 PO Box 587
 Weatherford, OK 73096

Phone 580-772-5939
 Mobile 580-774-7713
 Fax 580-772-1590

MacBride, Marsha

From: Rehr, David K.
Sent: Friday, December 14, 2007 5:07 PM
To: MacBride, Marsha
Subject: FW: NPRM...localism for broadcasters

From: Sander, Jack [mailto:JSander@belo.com]
Sent: Friday, December 14, 2007 1:31 PM
To: Rehr, David K.
Subject: FW: NPRM...localism for broadcasters

Sent to McDowell and similar one to Tate, working on the other 3, I will also put in calls.

From: Sander, Jack
Sent: Friday, December 14, 2007 11:30 AM
To: 'Robert.McDowell@fcc.gov'
Subject: FW: NPRM...localism for broadcasters

Dear Commissioner McDowell,

I have had the pleasure to meet with you on a number of occasions and it has been clear to me that you are a strong supporter of localism and letting the marketplace evolve and develop in this ever changing world of technology. Local broadcasters do not need to be burdened with more regulations and "busy work". I am surprised and bewildered by the potential of regressing to more government demands at a time when broadcasters face more competitors, challenges and yet stay committed to serving their local community in many different ways. I urge you and your fellow commissioners to abandon this unnecessary and counter productive rule making initiative.

Thank you for your consideration,
Respectfully,
Jack Sander

MacBride, Marsha

From: Rehr, David K.
Sent: Friday, December 14, 2007 5:07 PM
To: MacBride, Marsha
Subject: FW: Localism

From: Larry Patrick [mailto:larry@patcomm.com]
Sent: Friday, December 14, 2007 1:41 PM
To: Kevin.Martin@fcc.gov; Jonathan.Adelstein@fcc.gov; Michael.Copps@fcc.gov; Deborah.Tate@fcc.gov; Robert.McDowell@fcc.gov
Subject: Localism

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

I am writing to you today to urge you not to turn back the hands of the clock and return to the burdensome regulations of decades past. As the operator of 11 small-market radio stations in Wyoming and an investor in 25 other small market radio stations in Iowa and Missouri, I know that the marketplace regulates the issue of localism well.

When we purchased an AM/FM combo and a separate FM in Gillette, Wyoming four years ago, the stations each did little news, sports and informational programming. That was wrong and contributed to the failure of those owners to succeed. They did not care enough about localism and found themselves failing their community and their business model.

After our purchase, we immediately launched four hours a day of live, local news and information programming on KIML-AM, we added dozens of hours of high school sports (girls as well as boys) on the FM stations, started broadcasting more community events, hired seven additional employees to improve the quality of the broadcasts. We invested nearly \$500,000 in new equipment to improve the sound of the stations. We opened up listener lines, have contributed well over \$350,000 in actual cash back to community organizations. Localism is just good business and good sense. We do not need the government to make us do what is right.

For small market operators, the burden of ascertainment, community panels and operators on duty 24 hours a day, seven days a week will only decrease our ability to invest in more news personnel or reduce my support of community organizations. If it will cost me \$25-50,000 more a year per station to have round-the-clock operations and to divert my management team to completing government forms, this makes me less able to hire more local on-air talent or inhibits my committed goal of contributing 10 percent of my stations' annual profit to my communities.

We have help build a indoor swimming pool, basketball courts and an indoor hockey rink in Cody, Wyoming. We have funded college scholarships at two different community colleges in Wyoming, contributed a significant amount to the Buffalo Bill Historical Center, one of the nation's premier Western art and history museums, funded a major public art donation for Sheridan, Wyoming and made significant contributions to The Nature Conservancy and the Yellowstone Park Foundation.

Please don't paint all broadcasters with a brush that says that we do not care about localism. We know that this is our touchstone and the very reason for our success. Government regulation has never improved broadcasting content. The marketplace and our basic understanding of staying in touch with our local communities is the key for us.

Thanks for your consideration of our position.

Larry Patrick

Larry Patrick
Managing Partner
Legend Communications
6805 Douglas Legum Drive
Suite 100
Elkridge, MD 21075
(410) 799-1740
larry@patcomm.com
www.patcomm.com

MacBride, Marsha

From: Rehr, David K.
Sent: Friday, December 14, 2007 5:06 PM
To: MacBride, Marsha
Subject: FW: NPRM - localism

From: Bruce Goldsen [mailto:bgoldsen@k1053.com]
Sent: Friday, December 14, 2007 1:57 PM
To: Kevin.Martin@fcc.gov
Subject: NPRM - localism

Dear Chairman Martin:

I am writing to strongly protest the rumored Notice of Proposed Rulemaking on revisiting the rules that relaxed regulations on commercial broadcast stations a quarter-century ago.

Broadcasters like us are serving their local communities every day. We now face competition not only from surrounding radio and television stations, but from satellite, internet and a host of other sources that didn't even exist a few years past.

Burdensome regulation is not necessary and will harm our ability to provide the very local service the FCC wants in communities like the one we serve in Jackson, Michigan. The limited staff we have work in a variety of areas, and already "multi-task" so that they can provide our listeners with news, weather, local sports, radiothons, remotes from area events and businesses, coverage of city council meetings, and a host of other activities. Every hour that they must spend cataloging and documenting what it is that we do day-in/day-out, is an hour spent NOT doing it. Quite frankly, it is a waste of time, talent, productivity and money - and does NOTHING to serve the public interest.

I strongly urge you not to turn back the clock and re-regulate local broadcasters. The system is working fine for the majority of locally owned and operated broadcasters like us. Please help us to do what we do best - keep serving our local community.

Thank you for your consideration. Have a wonderful holiday and a Happy New Year.

Sincerely yours,

Bruce Goldsen
Jackson Radio Works, Inc., WKHM AM/FM, WIBM Jackson MI
(517) 787-9546 / Fax (517) 787-7517

Rotary District 6400 Governor Elect 2008-09

MacBride, Marsha

From: Knight, Laurie
Sent: Friday, December 14, 2007 5:08 PM
To: MacBride, Marsha; Mago, Jane; Rehr, David K.
Subject: Fw: Report on Localism-Action Alert

See below

-----Original Message-----

From: Jerry Hadenfeldt <Jerry.Hadenfeldt@meredith.com>
To: Knight, Laurie <LKnight@nab.org>
Sent: Fri Dec 14 16:11:05 2007
Subject: FW: Report on Localism-Action Alert

More from the Meredith stations.

From: Guy Hempel
Sent: Friday, December 14, 2007 3:01 PM
To: Jerry Hadenfeldt
Subject: FW: Report on Localism

Jerry

Sent to the chairman and each commissioner individually this afternoon.

Hope all is well with you.

Guy

From: Guy Hempel
Sent: Friday, December 14, 2007 4:00 PM
To: 'robert.mcdowell@fcc.gov'
Cc: 'christina.pauze@fcc.gov'
Subject: Report on Localism

Commissioner McDowell

I understand that the FCC is considering a Report on Broadcast Localism in your meeting on Tuesday, December 18. I understand that the proposal in the localism NPRM would reinstate programming and reporting requirements that were eliminated 25 years ago. As a broadcaster with 34 years experience, who remembers those rules, I can assure you that we take localism just as seriously today as we did back then. We still run PSAs on a daily basis. We still support a number of local charitable organizations. I personally serve on four local community boards or committees. In the last election we donated free time to local politicians. In the past two years we have added four hours of daily local news – twenty hours per week. We have plans to add another thirty minutes of daily local news next fall.

The market dictates that we be local. The market dictates that we be responsible local community citizens. Our audience expects it. Our advertisers expect it. It is just good business.

The only thing that new rules will create is more paperwork; paperwork that was not necessary 25 years ago and paperwork that is certainly not necessary today.

I ask you to look at the collected works of local broadcasters and consider them on merit. When an ice storm hits Greenville, South Carolina, all stations in the area stay on the air providing the audience with important information. When schools are closed, the audience looks to us for information. When hurricanes hit the coast and move inland, all broadcasters in the area provide important safety information. We do it because we are local broadcasters, and that is simply what we do.

I urge you not to re-regulate local broadcasters. It is not needed and will create an unnecessary financial burden on my station.

Thank you for your consideration.

Guy Hempel

Guy W. Hempel

Vice President, General Manager

WHNS TV, Fox Carolina

21 Interstate Court

Greenville, South Carolina 29615

MacBride, Marsha

From: Knight, Laurie
Sent: Friday, December 14, 2007 5:09 PM
To: MacBride, Marsha; Mago, Jane; Rehr, David K.
Subject: Fw: I sent this to the commissioners.

See below

-----Original Message-----

From: Jerry Hadenfeldt <Jerry.Hadenfeldt@meredith.com>
To: Knight, Laurie <LKnight@nab.org>
Sent: Fri Dec 14 16:10:02 2007
Subject: FW: I sent this to the commissioners.

FYi

From: Doug Lowe
Sent: Friday, December 14, 2007 3:07 PM
To: Jerry Hadenfeldt
Subject: i sent this to the commissioners.

Commissioner Copps

I am very troubled by all the talk of localism requirements that have been buzzing around. In order to come up with a solution, there has to be a problem.

We serve our communities every day. All of our stations have significant news product each day, in total our 13 stations provide 300 hours of local news per week. Much of it is reporting the news of the day, important to our viewers, but we also do an exceptional job of pro-active reports. One story comes to mind, our station in Portland Oregon, KPTV, ran a series on the dangers of meth to both the user and the community. The pictures were frightening. We worked with the law enforcement community, and are proud of the work. It was educational, and we hope, scared some users so much that they stopped, or those considering starting never started.

I could write pages and pages of the good things we do. On our own. Without regulations.

Frankly there was a reason to do away with old regulations years ago. We used to have to do 'community affair' programming, with certain kinds of topics. While they may have sounded good to those in Washington, the viewers DID NOT WATCH.

My fear is that if we are regulated again, we will be forced to do more things that the viewers really have no desire to watch. The regulations will be burdensome and will take away resources from the good work we are already doing.

I urge you to not pass regulations that will be a waste of our time and will accomplish little.

Doug Lowe

Executive VP/Broadcast Group

Meredith Corporation

1716 Locust St.

Des Moines, IA 50309

(515) 284 -2295

Fax (515) 284-2514

Cell (515) 491-1715

MacBride, Marsha

From: David, John
Sent: Friday, December 14, 2007 5:17 PM
To: Mago, Jane; MacBride, Marsha
Subject: Fw:

-----Original Message-----

From: Pete Benedetti <pete.benedetti@nnbradio.com>
To: Rehr, David K. <DRehr@nab.org>; David, John <JDavid@nab.org>
Sent: Fri Dec 14 17:11:41 2007
Subject: FW:

FYI....see below copy of letter sent to all commissioners and Chairman Martin...this is incredible, lets hope they see the light.

pete

Pete Benedetti

President/CEO

New Northwest Broadcasters, LLC

1011 Western Ave. Suite 920

Seattle, WA 98104

206-204-0213 X 201 (O)

425-466-4628 (M)

pete.benedetti@nnbradio.com <blocked::mailto:pete.benedetti@nnbradio.com>

nnbradio.com

From: Pete Benedetti
Sent: Friday, December 14, 2007 2:10 PM
To: 'Kevin.Martin@fcc.gov'

Subject:

Dear Chairman Martin:

I am concerned about the localism NPRM that will be considered on December 18, 2007.

My 22-year career in radio, the last five as CEO of a small market radio group, has provided me both pre and post deregulation experience in large and small markets. It has been my privilege to operate a group of 36 radio stations dedicated to the communities in which we live and to diligently work toward their betterment with hands-on service and programming. The New Northwest Broadcasters, LLC employees take this responsibility seriously and without question. We fully understand the primary purpose of the licenses entrusted to our care.

I am appalled that my government and the commission would withdraw its trust of the American broadcasting community by considering these burdensome, dictatorial requirements. I humbly request that you renew your faith in the current system, and I feel confident that this wonderful industry will not let you or our local communities down.

Very truly yours,

Pete Benedetti

Pete Benedetti

President/CEO

New Northwest Broadcasters, LLC

1011 Western Ave. Suite 920

Seattle, WA 98104

206-204-0213 X 201 (O)

425-466-4628 (M)

pete.benedetti@nnbradio.com <blocked::mailto:pete.benedetti@nnbradio.com>

nnbradio.com

MacBride, Marsha

From: Mago, Jane
Sent: Friday, December 14, 2007 5:25 PM
To: MacBride, Marsha
Subject: FW: Impact of re-regulation on small market broadcasters

Jane E. Mago
 Senior Vice President & General Counsel
 National Association of Broadcasters
 1771 N Street, NW
 Washington, D.C. 20036
 Phone 202.429.5430 and Fax 202.775.3526
jmago@nab.org Email

The National Association of Broadcasters is a trade association that advocates on behalf of more than 8,300 free, local radio and television stations and also broadcast networks before Congress, the Federal Communications Commission and the Courts.

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From: Steve Newberry [mailto:snewberry@commonwealthbroadcasting.com]
Sent: Friday, December 14, 2007 5:22 PM
To: Kevin.Martin@fcc.gov; jonathon.adelstein@fcc.gov; michael.copps@fcc.gov; deborah.tate@fcc.gov; robert.mcdowell@fcc.gov
Cc: Mago, Jane
Subject: Impact of re-regulation on small market broadcasters

Mr. Chairman and Commissioners,

I write this note as a follow up to the voice messages I have left in each of your offices.

The proposals before the commission, while I am sure are well-intended, will be counter-productive in the FCC's desire to improve localism. America's broadcasters, particularly those in small markets similar to where we operate, are VERY PROUD of our record of localism and connectivity to our communities. These proposed regulatory modifications will simply increase the regulatory burden on stations and have the unintended impact of taking our local staffs out of the community roles and into the stations to fulfill the requirements.

I have enjoyed a very productive and strong personal relationship with each of you, and I know your proposals are intended to America's local broadcast services. However, I respectfully ask you to not take these steps.

With kind and best regards,

Steven W. Newberry

Commonwealth Broadcasting



Davis Wright Tremaine LLP

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December 14, 2007

Kevin J. Martin, Chairman
Michael J. Copps, Commissioner
Jonathan S. Adelstein, Commissioner
Deborah Taylor Tate, Commissioner
Robert M. McDowell, Commissioner
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: MB Docket No. 04-233
Notice of Proposed Rulemaking
on Broadcasting Localism**

Dear FCC:

We write on behalf of the broadcasters listed below to convey their surprise and disappointment at learning, through the press and their trade association, that the Report and Notice of Proposed Rulemaking on Broadcasting Localism appearing on the Agenda for FCC adoption at the Open Meeting on December 18, 2007 will tentatively conclude the Commission should impose various obligations on broadcasters that are describable only as a return to government-imposed mandates on programming that were rolled back over a quarter century ago as unnecessary in a competitive marketplace, particularly given the First Amendment burden that they imposed. Though we obviously have not seen the NPRM, it is hard to imagine any rational justification for the proposals it is rumored to contain. The re-imposition of ascertainment and specific programming requirements, more stringent main studio rules, and oversight of radio playlists would be particularly unsound policy, especially now, when broadcasters such as those joining in this letter face more competition than ever before – unimaginably more competition than that faced by broadcasters when the Commission concluded that marketplace forces obviated the need for these types of programming restrictions in the mid-1980s. If these rumors of the Commission's plan are indeed true, we urge the Commission to abandon these plans rather

than entrenching the proposals as ones that will be implemented unless it can be convinced to the contrary.

It is our understanding, more specifically, that the NPRM will seek comment on tentative conclusions in several areas that, if adopted, would directly insert the FCC into how broadcasters determine they can best serve their communities of license, including the content choices they make in doing so. For example, it appears the Commission is poised to go back to prescribing the specific steps each broadcaster must undertake to determine its program choices – including specific requirements for meeting regularly with specific community leaders to get their input on programming – as well as specific quantities of certain types of shows, such as news, public affairs, and similar programming, that broadcasters must offer. These requirements would be backed by new reporting obligations for licensees, and processing guidelines that would require action by the full Commission on license renewals, rather than at the Bureau level, if certain preset quantities of programming are not met. It also seems the Commission is prepared to begin seeking detailed information about how radio stations compile their playlists, including whether they air any “local music.” The Commission also apparently is proposing that it return to old rules requiring all stations to have a manned main studio during all hours of operation.

While each of the undersigned broadcasters agree that serve to the public is important, none can find any reason for the re-imposition of rules that were deemed by the Commission itself to be unnecessary 25 years ago. It is in each broadcasters own self-interest that they determine the needs of their audience and address those needs so as to not become irrelevant to their audiences. But broadcasters need the flexibility to determine how the determinations of what is important to their audience is made, and how the service to the public is provided. Adopting a one-size-fits-all approach, where a broadcaster faces heightened regulatory scrutiny if they don't reach some arbitrary level of some particular type of programming that someone in Washington defines and deems important, does not provide a recipe for creating compelling content in Peoria, St. George or Ventura.

Requirements of the type rumored to be on the Commission's agenda are vestiges of FCC rules that have long since been abandoned as intrusive and unnecessary, especially as broadcasters face more and more competition from both old and new media. The requirements that the Commission long ago abandoned were quite burdensome, especially for small stations and stations in small markets with limited staffs where, rather than spending time on broadcast operations, stations had to ensure their operations met programming standards reflecting an arbitrary set of government-imposed standards as to what was good for a station's audience. This was so even if the station felt, because of its format or the audience demographics, that a particular type of programming did not serve its audience. Indeed, as stated in the Notice of Inquiry opening the docket into which the instant NPRM will be adopted, “the Commission deregulated many behavioral rules ... in the 1980s,” because it “found that market forces, in an increasingly competitive environment, would encourage broadcasters to [serve their local communities], and that certain rules were no longer necessary.” *Broadcast Localism*, 19 FCC Rcd. 12425 (2004). The *Radio Deregulation Order* and *Commercial TV Deregulation Order*



eliminated the FCC's nonentertainment programming guideline, ascertainment mandates, and program log requirements, *Deregulation of Radio*, 84 F.C.C.2d 968 (1981); *Revision of Programming and Commercialization Policies, Ascertainment Requirements, and Program Log Requirements for Commercial Television Stations*, 98 F.C.C.2d 1075 (1984), and the Commission later revised the main studio rules to permit broadcasters to locate their main studios outside their communities of license at any point in their city contour, and to eliminate the station program origination rule. *Amendment of Sections 73.1125 and 73.1130 of the Commission's Rules, the Main Studio and Program Origination Rules for Radio and Television Broadcast Stations*, 3 FCC Rcd 5024 (1988).

The Commission correctly held then that regulating broadcasters this granularly was a poor substitute for market forces, and unduly intrusive into their editorial discretion as well. The economic incentive of the fear of the loss of audience to a competitor who better served the public was deemed enough to ensure that the broadcaster acted responsibly. Indeed, twenty years ago, as the Commission neared the end of the deregulatory efforts highlighted above, there were 10,175 radio stations and 1,651 television stations vying for audiences. *Broadcast Station Totals as of September 30, 1987*, News Release (rel. October 6, 1987). Today, the number of radio stations has grown by forty-five percent to 14,754 stations, and the number of television stations has nearly tripled to 4,677 stations. *Broadcast Station Totals as of September 30, 2007*, News Release (rel. October 18, 2007). In other words, at a time when the FCC now plans to reimpose onerous programming and other obligations, there are almost twice as many broadcast stations competing than there were when it removed those obligations on grounds that competitive forces rendered them unnecessary.

And that is without even considering the many other forms of competition for audio and video services broadcasters did not face when the Commission deregulated. In today's world, with both radio and television provided over cable, satellite and Internet, and other digital entertainment choices as well, broadcasters are forced, if for no other reason than by self-interest, to address what local audiences find relevant, or the broadcaster will have that audience abandon the station for some other medium. This cuts directly to the heart of the contradiction that would lie at the heart of any NPRM that proposed unnecessary FCC oversight of broadcast content in the name of ensuring that "localism" is promoted – with so many competing platforms vying for the audience attention, one of the principal means broadcasters have of distinguishing themselves from a field of competitors that is more crowded than at any point in history, is their presence in, and ability to assess and serve the interests of, their local market. Now, more than ever, specific quantitative standards for broadcast programs are not needed as broadcasters must be allowed the flexibility to address the needs of their audiences in a way most relevant to that audience, not according to some prescribed formula.

The Commission's apparent plan to return to dictating to licensees the amounts and types of programming that will serve local interests, and how they should go about ascertaining those interests, also is utterly inconsistent with broadcasters' First Amendment rights. Indeed, in deregulating in these areas in the first instance, the Commission displayed its awareness that "the



public interest standard necessarily invites reference to First Amendment principles,” and that “Congress intended [] broadcasting to develop with the widest journalistic freedom.” *Commercial TV Deregulation Order*, 98 FCC 2d at 1089 (citing *CBS, Inc. v. DNC*, 412 U.S. 914 (1973); *FCC v. National Citizens Committee for Broad.*, 436 U.S. 775, 795 (1978)). See also *PIRG v. FCC*, 522 F.2d 1060, 1067 (1st Cir. 1975) (expressing “doubts as to the wisdom of mandating ... government intervention in the programming ... decisions of private broadcasters”); *Anti-Defamation League of B’nai B’rith v. FCC*, 403 F.2d 169, 172 (D.C. Cir. 1968) (“the First Amendment demands that [the FCC] proceed cautiously [in reviewing programming content] and Congress ... limited [FCC] power in this area”). Moreover, the evolution of the competitive landscape since the FCC deregulated should “obviate the constitutional legitimacy of the FCC’s robust oversight” of broadcast content in the manner it appears the NPRM will recommend. *Fox Television Stations, Inc. v. FCC*, 489 F.3d 444 (2d Cir. 2007). This is especially significant given that the Commission concluded – *twenty-three years ago* – that “concerns with the First Amendment are exacerbated by the lack of a direct nexus between a quantitative approach and licensee performance” when it comes to ascertainment and programming obligations such as those the NPRM forebodes. *Commercial TV Deregulation Order*, 98 FCC 2d at 1089 (citing *Office of Communication of the United Church of Christ v. FCC*, 707 F. 2d 1413, 1430 (D.C. Cir. 1983); *National Black Media Coalition v. FCC*, 589 F.2d 578, 581 (D.C. Cir. 1978)).

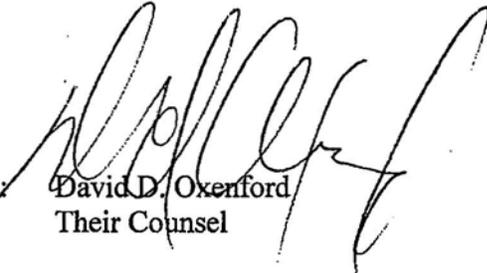
All things considered, there simply is no justification for the type of content-intensive FCC regulations that it is rumored that the NPRM will propose in the name of “broadcast localism.” Broadcasters have served their communities of license for decades, and are in a better position than any non-local competitor – or Washington, D.C. regulator – to determine what will best serve local interests. The competition that the Commission cited a quarter century ago has only blossomed, increasing the pressure on broadcasters to respond to local concerns to set themselves apart in the market. The Commission cannot lightly abandon its precedent of the last quarter century, nor can it lightly interfere with broadcasters’ editorial discretion in that regard without violating long-settled First Amendment precepts.

For these reasons, the named broadcasters respectfully urge the Commission to table or otherwise reconsider the NPRM if it indeed contains the provisions that have been reported before its adoption and/or release at the Open Meeting.

Buckley Broadcasting/ WOR, LLC
Buckley Broadcasting of New York, LLC
Buckley Broadcasting of Connecticut, LLC
Buckley Communications, Inc.
Buckley Broadcasting of California, LLC
Buckley Broadcasting Corporation of Monterey
Buckley Broadcasting Corporation of the San
Joaquin Valley
Buckley Broadcasting Corporation of Salinas
Canyon Media Corporation



Connoisseur Media, LLC
Connoisseur Media of Omaha, LLC
Connoisseur Media of Bloomington, LLC
Connoisseur Media of WV-OH, LLC
Connoisseur Media of Wichita, LLC
Connoisseur Media of Erie, LLC
Connoisseur Media of Billings, LLC
Family Radio, Inc.
Frandsen Media Company, LLC
Gold Coast Broadcasting, LLC
Huron Broadcasting, LLC
Jackson Radio Works, Inc.
Long Nine, Inc.
Mid-West Management, Inc.
Monterey Licenses, LLC
MW Springmo, Inc.
New Field Broadcasting, LLC
NRC Broadcasting Mountain Group, LLC
NRC Broadcasting, Inc.
People's Wireless, Inc.
Point Broadcasting Company
Rincon License Subsidiary LLC
Sand Hill Media Corporation
Sun Valley Radio, Inc.
Triad Broadcasting Company, LLC
Wildcat Communications, L.L.C.
WSJM, Inc.

By: 
David D. Oxenford
Their Counsel

cc: Monica Desai, Chief



Davis Wright Tremaine LLP

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December 14, 2007

Kevin J. Martin, Chairman
Michael J. Copps, Commissioner
Jonathan S. Adelstein, Commissioner
Deborah Taylor Tate, Commissioner
Robert M. McDowell, Commissioner
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: MB Docket No. 04-233
Notice of Proposed Rulemaking
on Broadcasting Localism**

Dear FCC:

We write on behalf of the State Broadcast Associations listed below to convey their surprise and disappointment at learning that the Report and Notice of Proposed Rulemaking on Broadcasting Localism appearing on the Agenda for FCC adoption at the Open Meeting on December 18, 2007 will tentatively conclude the Commission should impose various obligations on broadcasters that are describable only as a return to government-imposed mandates on programming that were rolled back over a quarter century ago as unnecessary in a competitive marketplace, particularly given the First Amendment burden that they imposed. If this is in fact the case, it is hard to imagine any rational justification for abandoning the precedents set in the last 25 years. The re-imposition of ascertainment and specific programming requirements, more stringent main studio rules, and oversight of radio playlists would be particularly unsound policy, especially now, when broadcasters face more competition than ever before – unimaginably more competition than that faced by broadcasters when the Commission concluded that marketplace forces obviated the need for these types of programming restrictions in the mid-1980s. If these rumors of the Commission's plan are indeed true, we urge the Commission to abandon these



plans rather than entrenching the proposals as ones that will be implemented unless the Commission can be convinced otherwise.

Initially, it is important to note that each of the undersigned broadcast associations agree that service to the public is paramount, and is the bedrock of the broadcast industry, setting it apart from virtually any other industry in the country. The State Broadcast Associations have repeatedly demonstrated to the Commission in many proceedings the dedication of their members to serving the public. That being said, however, the Associations cannot find any reason for the re-imposition of rules that were deemed by the Commission itself to be unnecessary 25 years ago. It is in each broadcaster's own self-interest that they determine the needs of their audience and address those needs so as to not become irrelevant to their audiences. Broadcasters accordingly require the flexibility to decide how best to make the determinations of what is important to their audience, and how service to the public is provided. Adopting a one-size-fits-all approach, where broadcasters face heightened regulatory scrutiny if they don't reach some arbitrary level of some particular type of programming that someone in Washington defines and deems important, does not provide a recipe for creating compelling content in every corner of Maine or Texas or Washington State.

It is our understanding that the NPRM will seek comment on tentative conclusions in several areas that, if adopted, would directly insert the FCC into the process by which broadcasters determine how they can best serve their communities of license, including the content choices they make in doing so. For example, it appears the Commission is poised to go back to prescribing the specific steps each broadcaster must undertake to determine its program choices – including specific requirements for meeting regularly with specific community leaders to get their input on programming – as well as requiring specific quantities of certain types of shows, such as news, public affairs, and similar programming. These requirements would be backed by new reporting obligations for licensees, and processing guidelines that would require action by the full Commission on license renewals, rather than at the Bureau level, if certain preset quantities of programming are not met. It also seems the Commission is prepared to begin seeking detailed information about how radio stations compile their playlists, including whether they air any “local music.” The Commission also apparently is proposing that it return to old rules requiring all stations to have a manned main studio during all hours of operation.

Requirements of the type rumored to be on the Commission's agenda are vestiges of FCC rules that have long since been abandoned as intrusive and unnecessary, especially as broadcasters face more and more competition from both old and new media. The requirements that the Commission long ago abandoned were quite burdensome, especially for small stations and stations in small markets with limited staffs where, rather than spending time on broadcast operations, stations had to ensure their operations met programming standards reflecting an arbitrary set of government-imposed standards as to what was good for a station's audience. Moreover, the regulatory risk and burden to each broadcaster, especially the smaller stations which already have staffs that are stretched to the breaking point, cannot be calculated. Imposing specific quantitative standards on something as subjective as what is good

programming requires that small stations, rather than spending unavailable funds to hire lawyers to defend their practices, must hew to the narrow confines of the prescribed program guidelines, even if they think that some other mix of programming might better serve their audiences. As a result, programming becomes more homogenized, not more diverse. Moreover, the regulations historically did not produce better programming, but instead simply a greater regulatory burden that resulted in litigation over meaningless regulatory details. Notably, with respect to the ascertainment, among the reasons for repealing the formal requirements was that renewal challenges typically were not directed to the targeted station's failure to serve the needs of its community, but rather petitions to deny implicating ascertainment challenged failures to comply with strict adherence to numerical quotas of interviewees, not the absence of ascertainment or community-interest programming itself. See, e.g., *Deregulation of Radio*, 73 F.C.C.2d 457, 519 (1979) ("since the adoption of the initial Primer in 1971, the cases dealing with ascertainment have been so numerous that just the annotated index of cases covers almost 60 pages" but "[t]he bulk of these cases deal with purely mechanistic aspects of the formal ascertainment procedures."). Such requirements accordingly have a substantial chilling effect, as broadcasters simply cannot afford the regulatory risk of doing something new or breaking the mold, yet produce little in the way of the results that the FCC is apparently seeking. Imposing these kind of quantitative obligations on the creative process simply is not justified.

Indeed, as stated in the Notice of Inquiry opening the docket into which the instant NPRM will be adopted, "the Commission deregulated many behavioral rules ... in the 1980s," because it "found that market forces, in an increasingly competitive environment, would encourage broadcasters to [serve their local communities], and that certain rules were no longer necessary." *Broadcast Localism*, 19 FCC Rcd. 12425 (2004). The *Radio Deregulation Order* and *Commercial TV Deregulation Order* eliminated the FCC's nonentertainment programming guideline, ascertainment mandates, and program log requirements, *Deregulation of Radio*, 84 F.C.C.2d 968 (1981); *Revision of Programming and Commercialization Policies, Ascertainment Requirements, and Program Log Requirements for Commercial Television Stations*, 98 F.C.C.2d 1076 (1984), and the Commission later revised the main studio rules to permit broadcasters to locate their main studios outside their communities of license at any point in their city contour, and to eliminate the station program origination rule. *Amendment of Sections 73.1125 and 73.1130 of the Commission's Rules, the Main Studio and Program Origination Rules for Radio and Television Broadcast Stations*, 3 FCC Rcd 5024 (1988).

The Commission correctly held then that regulating broadcasters this granularly was a poor substitute for market forces, and unduly intrusive into their editorial discretion as well. The economic incentive of the fear of the loss of audience to a competitor who better served the public was deemed enough to ensure that the broadcaster acted responsibly. As Commissioner Quello stated upon adoption of the Notice of Inquiry and Proposed Rulemaking that begat the *Radio Deregulation Order*, the "onerous process of ascertainment of community needs and interests, as defined in great detail by this Commission, is a mechanistic exercise which has only served to elevate form over substance. A broadcaster, if he is to survive and prosper, must in his own way know and ascertain his community." *Deregulation of Radio*, 73 F.C.C.2d at 589.



Indeed, twenty years ago, as the Commission neared the end of the deregulatory efforts highlighted above, there were 10,175 radio stations and 1,651 television stations vying for audiences. *Broadcast Station Totals as of September 30, 1987*, News Release (rel. October 6, 1987). Today, the number of radio stations has grown by forty-five percent to 14,754 stations, and the number of television stations has *nearly tripled* to 4,677 stations. *Broadcast Station Totals as of September 30, 2007*, News Release (rel. October 18, 2007). In other words, at a time when the FCC now plans to reimpose onerous programming and other obligations, there are almost twice as many broadcast stations competing than there were when it removed those obligations on grounds that competitive forces rendered them unnecessary.

And that is without even considering the many other forms of competition for audio and video services broadcasters did not face when the Commission deregulated. In today's world, with both radio and television provided over cable, satellite, and Internet, and other digital entertainment choices as well, broadcasters are forced, if for no other reason than by self-interest, to address what local audiences find relevant, or the broadcaster will have that audience abandon the station for some other medium. This cuts directly to the core contradiction that would lie at the heart of any NPRM that proposed unnecessary FCC oversight of broadcast content in the name of ensuring that "localism" is promoted – with so many competing platforms vying for the audience attention, one of the principal means broadcasters have of distinguishing themselves from a field of competitors that is more crowded than at any point in history, is their presence in, and ability to assess and serve the interests of, their local market. Now, more than ever, specific quantitative standards for broadcast programs are not needed as broadcasters must be allowed the flexibility to address the needs of their audiences in a way most relevant to that audience, not according to some prescribed formula.

The Commission's apparent plan to return to dictating to licensees the amounts and types of programming that will serve local interests, and how they should go about ascertaining those interests, also is utterly inconsistent with broadcasters' First Amendment rights. Indeed, in deregulating in these areas in the first instance, the Commission displayed its awareness that "the public interest standard necessarily invites reference to First Amendment principles," and that "Congress intended [] broadcasting to develop with the widest journalistic freedom." *Commercial TV Deregulation Order*, 98 FCC 2d at 1089 (citing *CBS, Inc. v. DNC*, 412 U.S. 914 (1973); *FCC v. National Citizens Committee for Broad.*, 436 U.S. 775, 795 (1978)). See also *PIRG v. FCC*, 522 F.2d 1060, 1067 (1st Cir. 1975) (expressing "doubts as to the wisdom of mandating ... government intervention in the programming ... decisions of private broadcasters"); *Anti-Defamation League of B'nai B'rith v. FCC*, 403 F.2d 169, 172 (D.C. Cir. 1968) ("the First Amendment demands that [the FCC] proceed cautiously [in reviewing programming content] and Congress ... limited [FCC] power in this area"). Moreover, the evolution of the competitive landscape since the FCC deregulated should "obviate the constitutional legitimacy of the FCC's robust oversight" of broadcast content in the manner it appears the NPRM will recommend. *Fox Television Stations, Inc. v. FCC*, 489 F.3d 444 (2d Cir. 2007). This is especially significant given that the Commission concluded – *twenty-three years ago* – that "concerns with the First Amendment are exacerbated by the lack of a direct nexus between a quantitative approach and



licensee performance” when it comes to ascertainment and programming obligations such as those the NPRM forebodes. *Commercial TV Deregulation Order*, 98 FCC 2d at 1089 (citing *Office of Communication of the United Church of Christ v. FCC*, 707 F. 2d 1413, 1430 (D.C. Cir. 1983); *National Black Media Coalition v. FCC*, 589 F.2d 578, 581 (D.C. Cir. 1978)).

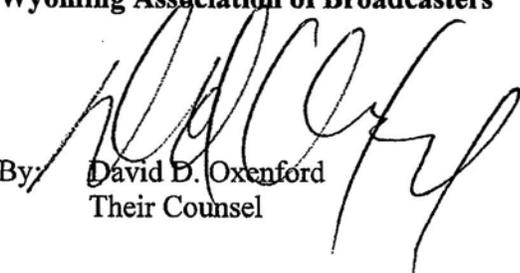
All things considered, there simply is no justification for the type of content-intensive FCC regulations that it is rumored the NPRM will propose in the name of “broadcast localism.” Broadcasters have served their communities of license for decades, and are in a better position than any non-local competitor – or Washington, D.C. regulator – to determine what will best serve local interests. The competition that the Commission cited a quarter century ago has only blossomed, increasing the pressure on broadcasters to respond to local concerns to set themselves apart in the market. The Commission cannot lightly abandon its precedent of the last quarter century, nor can it lightly interfere with broadcasters’ editorial discretion in that regard without violating long-settled First Amendment precepts.

For these reasons, the named State Broadcast Associations respectfully urge the Commission to table or otherwise reconsider the NPRM if it indeed contains the provisions that have been reported before its adoption and/or release at the Open Meeting.

Alabama Broadcasters Association
Arizona Broadcasters Association
Arkansas Broadcasters Association
Colorado Broadcasters Association
Connecticut Broadcasters Association
Florida Association of Broadcasters
Georgia Association of Broadcasters
Illinois Broadcasters Association
Iowa Broadcasters Association
Kentucky Broadcasters Association
Louisiana Association of Broadcasters
Maine Association of Broadcasters
MD/DC/DE Broadcasters Association
Massachusetts Broadcasters Association
Michigan Association of Broadcasters
Mississippi Association of Broadcasters
Missouri Broadcasters Association
Nebraska Broadcasters Association
Nevada Broadcasters Association
New Hampshire Association of Broadcasters
New Jersey Broadcasters Association
New Mexico Broadcasters Association
The New York State Broadcasters Association, Inc.
North Dakota Broadcasters Association



**Oklahoma Association of Broadcasters
Oregon Association of Broadcasters
Pennsylvania Association of Broadcasters
Radio Broadcasters Association of Puerto Rico
South Dakota Broadcasters Association
Tennessee Association of Broadcasters
Vermont Association of Broadcasters
Washington State Association of Broadcasters
Wisconsin Broadcasters Association
Wyoming Association of Broadcasters**

By: 
David D. Oxenford
Their Counsel

cc: Monica Desai, Chief

Bobeck, Ann

From: Zaragoza, Richard R. [richard.zaragoza@pillsburylaw.com]
Sent: Friday, December 14, 2007 3:23 PM
To: kjmweb@fcc.gov; michael.copps@fcc.gov; jonathan.adelstein@fcc.gov; dtayloratateweb@fcc.gov; robert.mcdowell@fcc.gov
Cc: michelle.carey@fcc.gov; rick.chessen@fcc.gov; rudy.brioche@fcc.gov; amy.blankenship@fcc.gov; christina.pauze@fcc.gov; nasbalist@yahoogroups.com; MacBride, Marsha; Mago, Jane; Bobeck, Ann
Subject: Request that the Chairman Defer Action on Item No. 6 From December 18, 2007 Opening Meeting Consideration (Revised to Correct/Add Email Addresses)

Dear Mr. Chairman and fellow Commissioners,

As a communications lawyer with over 30 years of experience before the FCC, I respectfully request that the Commission defer action on Item No. 6 which is currently scheduled for consideration at the Commission's Open Meeting on December 18, 2007.

Press and other accounts strongly suggest that the proposals under consideration, including those relating to a broadcast station's programming discretion, will be very re-regulatory in nature, and will raise substantial constitutional concerns with litigation likely to follow. In such circumstances, some additional time for each of the Commissioners to evaluate the views of so many who have come forth in the last two or three days will conduce to the proper dispatch of the Commission's business by insuring a more complete record and even more informed decision-making.

A delay of at least 60 to 90 days would not be unreasonable. The proposals are completely inconsistent with some 25 years of past Commission precedent. Overturning that precedent deserves very cautious, measured consideration. Furthermore, the re-regulatory thrust of the proposals does not appear to take into account the explosion in (i) the number of radio and television stations that now exist in comparison to the number that existed some 25 years ago, and (ii) all of the "new" communications technologies upon which the public also rely for their news and information, e.g., cable, satellites, cellular radio, and the Internet.

A Commission decision proposing a broad array of re-regulatory changes to the Commission's broadcast rules is likely to further spook the equity and credit markets which are so vital to broadcasting's present and future. This is the worst possible time for the Federal government to consider rolling back the de-regulatory clock on broadcasting. At present, the broadcast industry is in disfavor on Wall Street. For one, Radio One's stock is but a fraction of its IPO price, and is way down this year. Credit markets are tight and are getting tighter. The country may be heading into a recession. Television and radio are transitioning to digital with many challenges and uncertainties. Concerns are being raised about Arbitron's PPM methodology which may adversely affect the credibility of those estimates. There is a TV writer's strike with no end in sight. Competing technologies continue to erode broadcast

audiences and siphon-off advertising. How much more bad news can the broadcasting industry, and its investment community partners, take? The fact that the Commissioners will have under consideration a Notice of Proposed Rule Making rather than a Report and Order is irrelevant in terms of the effect of the NPRM action on investment markets. An NPRM that is adopted by a majority of Commissioners is still a re-regulatory action and therein lies the problem. Furthermore, even an NPRM can chill the editorial judgments of broadcasters.

Mr. Chairman and fellow Commissioners, please give this matter more time for thoughtful consideration by all of the Commission's decision makers with continued input from all affected stakeholders.

My best,
Dick

Richard R. Zaragoza | Partner
Pillsbury Winthrop Shaw Pittman LLP

Tel: 202.663.8266 | Fax: 202.663.8264 | Cell: 703.304.7576
2300 N Street, NW | Washington, DC 20037-1122

Email: richard.zaragoza@pillsburylaw.com

Bio: <http://www.pillsburylaw.com/cgi-bin/richard.zaragoza>

HYPERLINK "<http://www.pillsburylaw.com>" www.pillsburylaw.com

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* Internal Revenue Service regulations generally provide that, for the purpose of avoiding federal tax penalties, a taxpayer may rely only on formal written advice meeting specific requirements. Any tax advice in this message does not meet those requirements. Accordingly, any such tax advice was not intended or written to be used, and it cannot be used, for the purpose of avoiding federal tax penalties that may be imposed on you or for the purpose of promoting, marketing or recommending to another party any tax-related matters.
=====

Jack N. Goodman

+1 202 663 6287 (t)

+1 202 663 6363 (f)

jack.goodman@wilmerhale.com

December 14, 2007

The Honorable Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: MB Docket No. 04-233

Dear Mr. Chairman:

On behalf of Schurz Communications, Inc. and Mt. Mansfield Television, Inc., we are writing to express concerns about some of the proposals that the Commission may consider next week in its broadcast localism proceeding. These companies operate stations that, across the country, provide (as do many others) extensive service to their communities, including high-quality local news and public affairs programming and involvement with charitable and civic affairs in their communities. These stations serve the local interests of their communities, not because the FCC requires them to do so, but because – as a bipartisan Commission recognized more than 20 years ago when it discarded many of its traditional broadcast rules – it is the right thing for broadcasters to do, both as members of their communities and for their own economic interests. And that is true for both single-station owners and group owners.

The Commission apparently may propose reinstating formal ascertainment rules, going back to processing guidelines for categories of desired programming, eliminating beneficial changes to the main studio rule, and other proposals that will signal a return to a regulatory era of the 1950's. The Commission concluded more than 20 years ago that these rules did not serve the public interest. Contemplating such a "brazen reversal of [so many years] of settled precedent" (*see* Commissioner Copps' dissenting statement in the recent *Tribune* decision), in a way that would reimpose such highly burdensome administrative and legal expenses on an entire industry, would make little sense.

Indeed, at a time when many stations are already facing enormous competitive pressures from other media, launching a reregulatory proposal of this kind would create precisely the kind

The Honorable Kevin J. Martin
December 14, 2007
Page 2

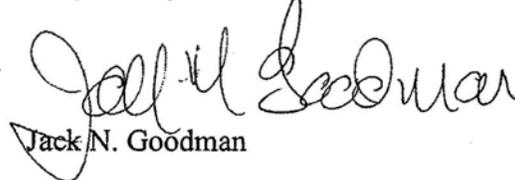
of regulatory uncertainty that harms stations' ability to finance new services. It should only be predicated on a compelling showing of pervasive industry failure. While the Commission's localism hearings included testimony from witnesses who were unhappy about one or another aspect of local broadcast service, the Commission cannot ignore the broadcasters who testified in those proceedings to their dedicated efforts to serve their communities and the hundreds of citizens and public officials who came forward to praise the work of their local broadcasters.

Nor did the command and control regulations of many decades ago result in better local service. The ascertainment rules required, as any veteran of those days can tell you, dry and formulaic exercises as much as meaningful efforts to interact with stations' communities. As evidence presented to the Gore Commission showed, years after the FCC abandoned its processing guidelines, most television stations were airing far more non-entertainment programming than was required by the processing guidelines. There is no reason to presume that stations are doing less now.

Last month, the Commission adopted new regulations that will require far more disclosure to the Commission and the public by television broadcasters of their programming and their efforts to determine the needs of their communities. We believe that those steps suffer from many of the same failings. But surely the Commission should wait to see what stations are actually doing, as they will report, than to presume in advance that they are not doing enough.

Finally, even if the Commission does believe it is appropriate to ask for comment on reinstating some of these regulations, we ask that the Commission avoid making any tentative conclusions about these rules in advance of public comment or of the results of the Commission's own new disclosure rules.

Respectfully submitted,



Jack N. Goodman

cc: The Honorable Michael J. Copps
The Honorable Jonathan S. Adelstein
The Honorable Deborah Taylor Tate
The Honorable Robert M. McDowell
Secretary



700 W 41st Avenue #102 Anchorage, AK 99503

P: 907-258-2424

F: 907-258-2414

Email: akba@gci.net

December 14, 2007

Kevin J. Martin, Chairman
Michael J. Copps, Commissioner
Jonathan S. Adelstein, Commissioner
Deborah Taylor Tate, Commissioner
Robert M. McDowell, Commissioner
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: MB Docket No. 04-233
Notice of Proposed Rulemaking
On Broadcasting Localism

Dear FCC Chairman and Commissioners:

It is with great alarm and concern that the Alaska Broadcasters Association address the recent proposed rulemaking on Localism.

The last thing broadcasters need at this juncture in time is to return to intrusive and burdensome regulations that were eliminated over a quarter of a century ago. They were eliminated as unnecessary due to market competition. Today we have more competition than ever from the Internet and video providers. If our stations fail to provide local quality programming, listeners and viewers can readily switch to a different form of media.

We are closing in on the HD digital conversion deadline. TV stations in particular are struggling with financial burdens and personnel issues due to the costs of converting to digital. Small market and mid sized markets are greatly impacted. As you all have visited Alaska, you are aware that our entire state is small market.

One size does not fit all when it comes to Localism. Each state has its own unique makeup. In Alaska with almost half of our stations not even located on a road system, Localism can and does mean out right life and death to viewers and listeners. Our stations would not survive if they did not pay attention to local issues.

Do we really want to return to the First Amendment Issue that was a major point in the earlier deregulation?

Yours truly,
Darlene Simono
Executive Director



700 W 41st Avenue #102 Anchorage, AK 99503

P: 907-258-2424

F: 907-258-2414

Email: akba@gci.net

December 14, 2007

Kevin J. Martin, Chairman
Michael J. Copps, Commissioner
Jonathan S. Adelstein, Commissioner
Deborah Taylor Tate, Commissioner
Robert M. McDowell, Commissioner
Federal Communications Commission
445 Twelfth Street, S.W.
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Yours truly,
Darlene Simono
Executive Director

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December 14, 2007

The Honorable Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: MB Docket No. 04-233

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The Commission apparently may propose reinstating formal ascertainment rules, going back to processing guidelines for categories of desired programming, eliminating beneficial changes to the main studio rule, and other proposals that will signal a return to a regulatory era of the 1950's. The Commission concluded more than 20 years ago that these rules did not serve the public interest. Contemplating such a "brazen reversal of [so many years] of settled precedent" (see Commissioner Copps' dissenting statement in the recent *Tribune* decision), in a way that would reimpose such highly burdensome administrative and legal expenses on an entire industry, would make little sense.

Indeed, at a time when many stations are already facing enormous competitive pressures from other media, launching a reregulatory proposal of this kind would create precisely the kind

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 3:14 PM
To: Hughes, Yvonne
Subject: FW: Localism NPRM - URGENT

From: Dave Kline [mailto:dkline@weeu.com]
Sent: Friday, December 14, 2007 3:04 PM
To: WEB - Marcom
Subject: RE: Localism NPRM - URGENT

OK Dave,
I e-mailed this letter to each member of the commission per your request...

Dear Mr. Adelstein,

Please do not make our job as the only and last locally owned and operated radio station in our community even more difficult by imposing the un-needed and exhaustive measures you are contemplating in the NPRM. We simply cannot generate enough revenue to support the paperwork and administrative expenses that these measures would require.

We serve our community loyally and annual give up tens of thousands of dollars of airtime for local concerns and causes. Anything that ends up costing us even more overhead holds the distinct possibility of putting us out of business which would be tragic for our community.

Please remember that we...

1. Serve our local community every day.
2. Cannot afford burdensome regulations that are not necessary and will harm our ability to provide the very local service the FCC wants.

I am strongly urging and will beg if need be, that you not turn back the clock and re-regulate local broadcasters.

Sincerely,

David L. Kline

WEEU Radio

34 North Fourth Street

Reading, PA 19601

(610) 376-7335 x 112

dklin@weeu.com

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 3:22 PM
To: Hughes, Yvonne
Subject: FW: Localism Issue

From: Mike Askins [mailto:MAskins@POTAWATOMI.ORG]
Sent: Friday, December 14, 2007 3:18 PM
To: 'Jonathan.Adelstein@fcc.gov'
Subject: Localism Issue

Commissioner Adelstein,

According to an email I just received from the NAB, the Federal Communications Commission has announced that it will consider a Report on Broadcast Localism and Notice of Proposed Rulemaking suggesting new rules for broadcasters at its meeting on Tuesday, Dec. 18, 2007.

We understand that proposals in the localism NPRM would turn back the clock and reinstate programming and reporting requirements eliminated more than 25 years ago. The proposals include establishing community advisory boards, specific program reporting requirements and a return to the pre-1998 main studio rule.

The NPRM also raises questions about whether radio licensees should provide data about music aired, including local music, and how their playlists are compiled.

I wish to voice my opinion on the matter. As a small town broadcaster, I endeavor to be as community oriented as possible and provide the most local programming available.

Shawnee, Oklahoma is located 30 miles east of Oklahoma City and falls within the OKC Metro radio market. Over the past 25 years we've seen our share of advertising revenues erode due to the metro market's inclusion of a stand-alone AM station that was once in a market unto itself. Advertising agencies often see only an AM in the bottom of the metro rankings rather than Shawnee's radio station for 77 years. Our only means of maintaining any audience loyalty is to make this station the "Home Town Radio Station". We provide local news, sports coverage, public service announcements, locally produced religious programming and public forums for local events. We really do provide the localism that I'm sure the Commission is looking for in all markets.

I am the General Manager, Program Director, Chief Operator and the Morning Show host... I wear several hats and am doing the best I can to cover all the bases. Additional regulations may not affect the on-air content, as we already emphasize our local programming but additional reporting and paperwork may affect my ability to do what I must do to remain legal on top of what I ought to be doing to "serve the public interest". Please don't add to the small operator's burdens by adding additional reporting requirements.

Sincerely,

Mike Askins

General Manager



KGFF Radio
P.O. Box 9
Shawnee, OK 74802-0009
Phone: (405) 273-4390
Fax (405) 273-4530
E-mail: mike@kgff.com
or maskins@potawatomi.org
Website: www.kgff.com

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 3:15 PM
To: Hughes, Yvonne
Subject: FW: Proposed Rulemaking at your Tuesday 12/18 meeting
Importance: High

From: Paul Cameron [mailto:pcameron@christianfamilyradio.net]
Sent: Friday, December 14, 2007 3:14 PM
To: WEB - Marcom
Subject: Fw: Proposed Rulemaking at your Tuesday 12/18 meeting
Importance: High

Dear David;

I am forwarding you a copy of what I just sent to the FCC via email. Do you feel I need to call as well?

Paul Cameron
 Executive Director & General Manager
 Christian Family Radio--Helping Families Build Healthy Relationships
 920-749-9364 ext. 24
 1909 W. Second St. Appleton, WI. 54914
 WEMI 91.9 Appleton/Oshkosh, 101.7 Fond du Lac, 101.7 Ripon, 107.3 Waupaca
 WEMY 91.5 Green Bay, 95.5 Two Rivers/Manitowoc
 WGNV 88.5 Wausau/Stevens Point & 94.1 Antigo
 Streaming website: <http://www.ChristianFamilyRadio.net>

----- Original Message -----

From: Paul Cameron
To: Kevin.Martin@fcc.gov
Cc: Michael.Copps@fcc.gov ; Jonathan.Adelstein@fcc.gov ; Deborah.Tate@fcc.gov ; Robert.McDowell@fcc.gov
Sent: Friday, December 14, 2007 2:09 PM
Subject: Proposed Rulemaking at your Tuesday 12/18 meeting

Dear Chairman Martin and Commissioners Copps, Adelstein, Tate and McDowell;

First let me thank you for your hard work in a rapidly changing arena and for the opportunity to hear what I have to say this afternoon.

I do not often write to the FCC, however I have chosen to do so in light of your upcoming Tuesday 12/18 meeting at which you are looking to propose additional rules for stations such as the ones I oversee.

It is my understanding in that in your efforts to look at localism, you are looking to reinstate programming and reporting requirements that were thankfully removed more than 25 years ago. As someone who has been with our group of stations since 1981, the less the additional paperwork and red tape, the more time that we have as a group of stations to maintain our live and local focus of broadcasting.

While I understand the idea of community advisory boards, we find that there is only so much time in the day for our team as well as those in the communities in which we serve. Instead of this motivating us to do more, it is just another added burden for an already short staffed organization. I am sure that there are others in the same boat as we are and I pray that they speak out.

I am also very alarmed about additional possibilities that you may require us to provide data about music aired, local music and how our playlists are developed and used. Again, more work and let time to work on our live and local focus.

I ask that you might seriously reconsider not moving forward with any of these recommendations, but rather table it and deal with other major issues that the FCC has before them. That additional regulations are just going to hinder & harm our efforts rather than strengthen and solidify the work we are doing.

Our stations serve our local communities every day. How many stations encourage their staffs to pray for their listeners and communities, or for that matter ask their listeners for prayer requests.

In closing, please do not go back to what we have come from and re-regulate our local stations.

May the Lord bless and keep you and I am looking forward to hearing from you as you have time.

Paul Cameron
Executive Director & General Manager
Christian Family Radio--Helping Families Build Healthy Relationships
920-749-9364 ext. 24
1909 W. Second St. Appleton, WI. 54914
WEMI 91.9 Appleton/Oshkosh, 101.7 Fond du Lac, 101.7 Ripon, 107.3 Waupaca
WEMY 91.5 Green Bay, 95.5 Two Rivers/Manitowoc
WGNV 88.5 Wausau/Stevens Point & 94.1 Antigo
Streaming website: <http://www.ChristianFamilyRadio.net>

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 3:14 PM
To: Hughes, Yvonne
Subject: FW: Reinstating programming and reporting requirement

From: Brad Howard [mailto:kofo@kofo.com]
Sent: Friday, December 14, 2007 3:12 PM
To: WEB - Marcom
Subject: Fw: Reinstating programming and reporting requirement

----- Original Message -----

From: Brad Howard
To: Jonathan.Adelstein@fcc.gov ; Michael.Copps@fcc.gov ; Deborah.Tate@fcc.gov ; Robert.McDowell@fcc.gov ; Kevin.Martin@fcc.gov
Sent: Friday, December 14, 2007 2:10 PM
Subject: Reinstating programming and reporting requirement

Dear Commissioners,

I'm angry right now. I'm angry at the amount of paper work I already have to file with the commission to be in compliance with the FCC's EEO program. I'm angry because I read a few weeks ago that your implementing new requirements on T-V broadcasters and telling them you now have to post your public file on the internet. And it probably won't be long before you require the same of radio. I'm angry because I'm notified today your thinking of reinstating rules that were deemed out of date more than 20 years ago. And because...in the name of...localism-if these rules are implemented-I will most likely be less local because I have to fill out the mandated paper work. And there is only 1 of me. I'm not Clear Channel or Cumulus or Entercom. I'm the owner of a single station AM in our county of license of 25,000 people. The night power allocated to me is not even enough to cover my county of license. We are local. We didn't desert our city of license like our former FM sister station did and move to Kansas City. We stayed here to serve the community. And I do for less than what a starting teacher in our local school district makes. And now what I do isn't enough. I'm expected to do more. I put in between 60 and 80 hours a week. I do the morning show. Act as GM. Program director. Part-time engineer. I get here at 03:45am and leave between 05:00 and 06:00pm at night. Just when am I supposed to take care of this new paper work your asking me to complete? We have 6 full-time employees and yet I practically need a Human Resources Department to make sure I don't run afoul of the EEO requirements. I'm trying. I'm trying real hard to follow the rules. I'm trying real hard to feed and cloth my family on \$28,000 a year. I love my community and I'm trying to give it the best dam radio station ever. But I swear sometimes you guys/gals make it real hard. Sometimes I feel like the only answer is to just mail my license back to you and do sometime else. Someday that may happen. Now tell me how does that improve localism?

Sincerely yours,

Brad Howard
 President/General Manager
 KOFO Radio
 Ottawa, KS

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 3:14 PM
To: Hughes, Yvonne
Subject: FW: Local service regulations

From: Metz, Perry S [mailto:metz@indiana.edu]
Sent: Friday, December 14, 2007 3:10 PM
To: 'Deborah.Tate@fcc.gov'
Subject: Local service regulations

As a general manager, I understand the FCC's concern about the provision of adequate (even exemplary) local service by individual television stations. Nevertheless, the proposed re-regulation of local stations poses an unproductive burden on the small guys, those of us out here trying to serve our communities every day. I manage a public station with a 21-county broadcast reach and somewhat more by satellite. We sponsor everything from free books to needy children to one of the last locally-produced children's programs in the country. We live and die by service to our communities. The programming requirements and reporting you are considering would take away from the time my small staff has to do its work. Please don't.

Thanks for your consideration,
Perry Metz
GM
WTIU
Bloomington IN

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 3:22 PM
To: Hughes, Yvonne
Subject: FW: Local Regulation

From: Dan Mitchell [mailto:dpm@m995.com]
Sent: Friday, December 14, 2007 3:15 PM
To: Kevin.Martin@fcc.gov
Cc: WEB - Marcom
Subject: Local Regulation

Having been a Local radio broadcaster since 1963 I have seen burdensome regulation and lax or absent regulation as now. The difference 40 years ago it was far easier to make money with one's local station. The clients were all local and people lived local. Today most of the major clients are chains regional or national and do not buy local radio in the smaller markets, below the top 50. We now truly scramble for local advertisers, and then to boot national programming is more popular with most of the listeners than locally originated programming. Is this a challenge for local station owners? You bet it is. Do we want to serve the local community? absolutely yes. Yet we must remain profitable to remain in business. Will a round of more burdensome reporting and paperwork achieve the goal of creating more service to the local community from the local broadcasters. NO! The thing it will achieve though is more pressure on the bottom line of the station because it will take more time and clerical to accomplish the compliance procedures. Please do not act hastily in creating more paperwork and more cost for the local owner operators.
Daniel P Mitchell President KMRJ Palm Springs CA.

Daniel P Mitchell
President
KMRJ/ m99.5 FM
1061 South Palm Canyon Drive
Palm Springs CA 92264
Ph: 760-778-6995
Fx: 760-778-1249
Cell: 760-272-6557
dpm@m995.com
www.m995.com

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 3:22 PM
To: Hughes, Yvonne
Subject: FW: Localism NPRM - URGENT
Attachments: FCC Proposed Rulemaking

From: Jerry Miller [mailto:milljerr@isu.edu]
Sent: Friday, December 14, 2007 3:17 PM
To: WEB - Marcom
Subject: RE: Localism NPRM - URGENT

FYI:
I'm attaching the email I just sent to the FCC as a result of your alert about the localism NPRM.

Thank you!

Jerry Miller
General Manager
KISU-FM 91.1
Box 8014
Pocatello, ID. 83209
208-282-2688 (o)
208-251-0679 (c)
milljerr@isu.edu

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 3:22 PM
To: Hughes, Yvonne
Subject: FW: Localism NPRM

From: John Chadwick [mailto:jchadwick@wrex.com]
Sent: Friday, December 14, 2007 3:18 PM
To: Kevin.Martin@fcc.gov
Cc: BOARDOakley, Ralph M.
Subject: Localism NPRM

Chairman Kevin Martin
Federal Communication Commission
Washington, D. C.

Dear Mr. Chairman Martin

As small market broadcasters our very survival depends on serving local communities. If we are not conscious of their needs and do not address them on a daily basis, we will lose them as viewers. Burdensome regulation on our small staff will have the opposite effect the FCC wants. I strongly urge you not to turn back the clock and re-regulate local broadcasters.

John Chadwick
Vice President General Manager
13 WREX Television
Rockford, Illinois

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 3:22 PM
To: Hughes, Yvonne
Subject: FW: Localism NPRM - URGENT

From: Bill Kring [mailto:kring@9and10news.com]
Sent: Friday, December 14, 2007 3:18 PM
To: Kevin.Martin@fcc.gov; Jonathan.Adelstein@fcc.gov; Michael.Copps@fcc.gov; Deborah.Tate@fcc.gov;
 Robert.McDowell@fcc.gov
Subject: FW: Localism NPRM - URGENT

Chairman Martin
 (202) 418-1000
 Advisor Michelle Carey
Kevin.Martin@fcc.gov

Commissioner Adelstein
 202-418-2300
 Advisor Rudy Brioche
Jonathan.Adelstein@fcc.gov

Commissioner Copps
 202- 418-2000
 Advisor Rick Chessen
Michael.Copps@fcc.gov

Commissioner Tate
 202-418-2500
 Advisor Amy Blakenship
Deborah.Tate@fcc.gov

Commissioner McDowell
 202- 418-2200
 Advisor Christina Pauze
Robert.McDowell@fcc.gov

Commissioners:

Everyday my station is proud to serve our community.

We serve our community not because of a government mandate but because we are members of the community and we care about it's future.

We serve our community by providing local news, local weather and local information that our community needs. But in addition to that information we make ourselves available to all members of our community. I answer many telephone calls, e-mails and letters everyday. We also attend and participate many community events on a daily, monthly and yearly basis. We have devise this system because we want to serve our community to the very best of our abilities.

We seek out input from all factions in ways that change constantly.

We strive to be accessible to all people not just those of a particular special interest groups.

I fear that any regulation that, although well meaning, cannot possibly address all the diverse needs and wants of every community of this diverse nation. I fear that broadcasters will be forced to comply with a regulation that may not be applicable in their community and the casualty will be the community actions and initiatives that have been working for many many years.

If the commission truly wants input from the community then first the commission should hear form the community of

broadcasters. The commission should review the many years of good community service broadcasters have provided and then decide if they want their future regulations to hinder or eliminate these services.

Thank you for your attention.

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 3:15 PM
To: Hughes, Yvonne
Subject: FW: Proposed Broadcast Re-Regulation

-----Original Message-----

From: Paul D Quinn [mailto:pquinn@hearst.com]
Sent: Friday, December 14, 2007 3:09 PM
To: Jonathan.Adelstein@fcc.gov
Subject: Proposed Broadcast Re-Regulation

Dear Commissioner Adelstein:

It has been brought to my attention that the FCC is considering turning the clock to a time when broadcasters were overly burdened with regulations that took many hours to prepare and many more hours at the FCC just to read, much less enforce. The reason these rules were changed is because broadcasters operate in the public interest, convenience and necessity not only to keep their license at renewal time but because it is good business. Show me a broadcaster not involved in the community they serve and I'll show you a failing business model. Needless mandatory regulation red tape will take valuable time away from operating necessities, including community service, and this would come at a time when new media alternatives (satellite radio, internet, wireless devices, cable and satellite TV) are siphoning off viewers and listeners and advertising revenue at an alarming rate. New record keeping requirements would add expense that will break the back of some very good small market stations or even large market niche broadcasters. You should think long and hard before putting additional burden on an already stressed industry, the only free radio and television service in America, and the envy of the rest of the world.

Please, I implore you not to send us back to a time of needless regulation, unless you can also turn back the clock to alleviate the competitive pressures that are now breathing down our necks.

Thank you for your consideration.

Paul Quinn
WGAL President & General Manager
717-735-7201
Fax 717-295-9143
1300 Columbia Ave.
Lancaster, PA 17603
Pquinn@hearst.com

=====
This e-mail message is intended for the personal use of the recipient(s) named above. If you are not an intended recipient, you may not review, copy or distribute this message.

If you have received this communication in error, please notify the Hearst Information Services HelpDesk (helpdesk@hearst.com) immediately by e-mail and delete the original message.

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 2:53 PM
To: Hughes, Yvonne
Subject: FW: Broadcast Localism

From: Lawrie, Dan (CXR-Tulsa) [mailto:Dan.Lawrie@CoxRadio.com]
Sent: Friday, December 14, 2007 2:51 PM
To: Kevin.Martin@fcc.gov; Jonathan.Adelstein@fcc.gov; Michael.Copps@fcc.gov; Deborah.Tate@fcc.gov; Robert.McDowell@fcc.gov; roy.stewart@fcc.gov
Subject: Broadcast Localism

As you consider changing rules regarding Broadcast Localism, I feel compelled to tell you about a cooperative effort between McAlester and Tulsa, Oklahoma Radio stations that proves people respond to and depend on local radio in times of hardship, and LOCAL radio delivers... without burdensome rules and regulations!

In the aftermath of the ice storm in Tulsa this week, 220,000 households were without power making firewood scarce and in desperate need. I made a call to Lee Anderson (owner/operator of several stations in McAlester, OK) on Monday morning and asked him to ask his listeners if they would be willing to sell firewood (at regular pricing) and deliver it to Tulsa so KRMG could give it away to its listeners in need of a heat source. They responded and we were able to purchase 13 ricks of wood from the McAlester area. We then invited KRMG listeners to drive to LaFortune Park in Tulsa and get enough free firewood to build a fire for one night.

The response was overwhelming! We had over **two hundred families** show up and we had to turn people away after 2 1/2 hours when our supply was exhausted.

LOCAL radio helped make 200+ Tulsa families a little warmer during a very difficult time!

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 2:39 PM
To: Hughes, Yvonne
Subject: FW: Report on Broadcast Localism and Notice of Proposed Rulemaking

From: Ken@kjol.org [mailto:Ken@kjol.org]
Sent: Friday, December 14, 2007 2:37 PM
To: WEB - Marcom
Subject: Fw: Report on Broadcast Localism and Notice of Proposed Rulemaking

Sir:

My comments, sent as a result of your URGENT alert.

Ken Andrews

----- Original Message -----

From: Ken@kjol.org
To: Kevin.Martin@fcc.gov ; Jonathan.Adelstein@fcc.gov ; Michael.Copps@fcc.gov ; Deborah.Tate@fcc.gov ; Robert.McDowell@fcc.gov
Sent: Friday, December 14, 2007 12:33 PM
Subject: Report on Broadcast Localism and Notice of Proposed Rulemaking

Sirs and Madam:

In light of the expected rulemaking proposal(s) on the part of the Commission relative to the Report on Broadcast Localism and Notice of Proposed Rulemaking to be considered on Tuesday, December 18, 2007, I have the following comments and recommendations:

1. Broadcasters are serving their local communities every day.
2. Burdensome regulation is not necessary and will harm my ability to provide the very local service the FCC wants.
3. I strongly urge you not to turn back the clock and re-regulate local broadcasters.

We take our responsibilities to the Commission and the communities we serve with utmost seriousness. Therefore, I respectfully request that Commission not impose undo and unnecessary restrictions and regulations upon broadcasters that hinder our ability to serve the public interest, convenience and necessity of our listeners and communities.

Sincerely,

Ken Andrews, Manager
 KJOL - 620 and 1400
 United Ministries

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 2:28 PM
To: Hughes, Yvonne
Subject: FW: NPRM on Localism

From: Mike Lee [mailto:mlee@kxxv.com]
Sent: Friday, December 14, 2007 1:57 PM
To: WEB - Marcom
Subject: Fw: NPRM on Localism

----- Original Message -----

From: Mike Lee
To: Kevin.Martin@fcc.gov ; Jonathan.Adelstein@fcc.gov ; Michael.Copps@fcc.gov ; Deborah.Tate@fcc.gov ; Robert.McDowell@fcc.gov
Sent: Friday, December 14, 2007 12:54 PM
Subject: NPRM on Localism

To The Chairman and Commissioners,

I've been in broadcasting since 1971 and in station management since 1987. I would like to emphatically express to each of you that your proposal to enact regulation concerning local programming is absolutely unnecessary and request that such regulation not be implemented.

Our stations serve our community every day, 365 days a year, with local news, weather and sports, instant severe weather warnings, live political debates in election years, election coverage, and sponsorship of dozens of local charitable events (and this is just a partial list).

I'm not sure what has caused any of you to feel that such regulation is necessary, but as a life-long broadcaster I assure you it is not. Most likely, any additional regulation and reporting requirements would require the hiring of additional personnel to be in compliance, and that would likely come at the expense of news and other employees whose job it is to gather and broadcast the very information you seem concerned with.

It has never been more important for local, free over-the-air broadcasters to distinguish themselves from cable and satellite, and we do not need FCC regulation forced upon us to do so.

Sincerely,
Mike Lee
Vice President/General Manager
KXXV-TV/DT & KRHD-LP
Waco/Bryan-College Station, TX

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 2:27 PM
To: Hughes, Yvonne
Subject: FW: Localism in Peoria, Illinois 12/14/07

From: JGreeley@regentcomm.com [mailto:JGreeley@regentcomm.com]
Sent: Friday, December 14, 2007 2:18 PM
To: WEB - Marcom
Subject: FW: Localism in Peoria, Illinois 12/14/07

FOR ADVERTISING OPPORTUNITIES
www.peoria-radio.com

J.R. Greeley VP/GM
 REGENT - Peoria
 309-676-5000 w
 309-645-9575 c
 309-676-2600 f
jgreeley@regentcomm.com

From: J.R. Greeley
Sent: Friday, December 14, 2007 1:17 PM
To: 'Kevin.Martin@fcc.gov'; 'Jonathan.Adelstein@fcc.gov'; 'Michael.Copps@fcc.gov'; 'Deborah.Tate@fcc.gov';
 'Robert.McDowell@fcc.gov'
Subject: Localism in Peoria, Illinois 12/14/07

WFYR-FM, WGLO-FM, WIXO-FM, WZPW-FM & WVEL-AM believe that our stewardship to our communities is our duty. We are public trustees acting in the public interest in central Illinois (Greater Peoria, Illinois). WFYR-FM received a CRYSTAL AWARD in 2007 for Community Service. The community service organizations in Greater Peoria would be happy to tell YOU about our ALL the community service efforts from Broadcasters. There is no need for additional regulation for broadcasters to serve our local communities. Thank you J.R.

FOR ADVERTISING OPPORTUNITIES
www.peoria-radio.com

J.R. Greeley VP/GM
REGENT - Peoria
309-676-5000 w
309-645-9575 c
309-676-2600 f
jgreeley@regentcomm.com

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 2:28 PM
To: Hughes, Yvonne
Subject: FW: Localism NPRM - URGENT
Attachments: FCC Letter 2006.doc

From: Wilcox, Jim [mailto:jim.wilcox@walb.com]
Sent: Friday, December 14, 2007 1:45 PM
To: WEB - Marcom
Cc: STATE-GA Pigue, Jere; Edelman, Marty; Daugherty, Wayne
Subject: FW: Localism NPRM - URGENT

From: Wilcox, Jim
Sent: Friday, December 14, 2007 1:44 PM
To: 'Kevin.Martin@fcc.gov'; 'Jonathan.Adelstein@fcc.gov'; 'Michael.Copps@fcc.gov'; 'Deborah.Tate@fcc.gov'; 'Robert.McDowell@fcc.gov'
Subject: Localism NPRM - URGENT

12/14/2007

PLEASE DO NOT TO IMPOSE BURDENSOME REGULATION ON LOCAL BROADCASTERS

I understand The Federal Communications Commission (FCC) will consider a Report on Broadcast Localism and Notice of Proposed Rulemaking suggesting new rules for broadcasters at its meeting on Tuesday, Dec. 18, 2007.

I understand that proposals in the localism NPRM would turn back the clock and reinstate programming and reporting requirements eliminated more than 25 years ago. The proposals include establishing community advisory boards, specific program reporting requirements and a return to the pre-1998 main studio rule.

The NPRM also raises questions about whether radio licensees should provide data about music aired, including local music, and how their playlists are compiled.

- **Broadcasters are serving their local communities every day.**
- **Burdensome regulation is not necessary and will harm my ability to provide the very local service the FCC wants.**
- **I strongly urge you not to turn back the clock and re-regulate local broadcasters.**

The broadcasters and viewers in South Georgia appreciate your support.

Sincerely,

A handwritten signature in cursive that reads "Jim" is positioned above the NBC peacock logo. The signature is written in black ink and is slightly slanted to the right.

Jim Wilcox
V. P. / General Manager
WALB-TV
1709 Stuart Ave.
Albany, Ga. 31707

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 2:29 PM
To: Hughes, Yvonne
Subject: FW: Localism NPRM - URGENT

From: Lawson Fox [mailto:LFox@KTVN.com]
Sent: Friday, December 14, 2007 2:28 PM
To: WEB - Marcom
Subject: RE: Localism NPRM - URGENT

The following email was sent to all five commissioners:

Dear Chairman Martin:

KTVN – TV produces 22 hours of local news per week plus a weekly half hour program addressing community issues that we identify through meetings with community leaders. Doing this requires a great financial commitment. Time, money and resources used producing reports attesting to these activities take resources that can no longer be used to do the local programming that the reports will cover.

Implementing additional reporting requirements are in conflict with KTVN's ability to serve its local community. KTVN can best determine how it will serve the public interest as a broadcast licensee.

Recent action by the FCC to scan and place KTVN's Public File on line has already taken away resources that can otherwise be used to serve our viewers. Stop! No More!

Lawson Fox
General Manager
KTVN
4925 Energy Way
Reno, NV 89502
775-858-2222

KTVN Channel 2, 4925 Energy Way, Reno, NV 89502
Phone: 775-858-2222 Fax: 775-861-4298

This email may be considered an advertising or promotional message. **If you do not wish to receive further emails from KTVN Channel 2 that contain an advertising or solicitation message, please reply to this email with a subject of "Opt-Out".** You must use this method to notify KTVN of your opt-out request, as we cannot guarantee that other methods of notification will be effective. Please be aware that we may continue to contact you via email for administrative or informational purposes, including follow-up message regarding transactions you have undertaken. By law, such messages are not considered to be commercial email.

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 2:28 PM
To: Hughes, Yvonne
Subject: FW: Broadcast Localism

From: Carl Gardner [mailto:cgardner@journalbroadcastgroup.com]
Sent: Friday, December 14, 2007 1:41 PM
To: Kevin.Martin@fcc.gov; Jonathan.Adelstein@fcc.gov; Robert.McDowell@fcc.gov; Deborah.Tate@fcc.gov; Michael.Copps@fcc.gov
Subject: Broadcast Localism

Dear Commissioners:

I urge you NOT to burden local broadcast stations with programming and reporting requirements beyond what they already carry.

Local TV and radio stations, including those owned and operated by the Journal Broadcast Group, already devote very substantial staff resources and air time to local programming and community service. We are proud of our record in that regard, and we believe our local communities would concur.

Broadcast stations are operating today under very challenging business conditions. Any addition of unnecessary regulatory burdens will only serve to siphon away precious local staff resources, and will undermine the ability of stations to serve their communities.

Please do not damage the ability of local radio and TV stations to serve their audiences. Do not re-impose unnecessary and ineffective regulations on programming. Do not burden stations with time-consuming reporting obligations. Let stations instead use their staff resources to do what they do best – inform, entertain, and serve.

Carl Gardner
Vice President, Digital Media
Journal Communications, Inc.
Executive Vice President, Television and Radio Operations
Journal Broadcast Group, Inc.
333 West State Street
Milwaukee, WI 53203
(414) 967-5448
cgardner@journalbroadcastgroup.com

.....
The information contained in this communication may be confidential or legally privileged and is intended only for the recipient named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication or its contents is strictly prohibited. If you have received this communication in error, please immediately advise the sender and delete the original and any copies from your computer system.

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 2:27 PM
To: Hughes, Yvonne
Subject: FW:

-----Original Message-----

From: Matt James [mailto:matt.james@kolotv.com]
Sent: Friday, December 14, 2007 2:16 PM
To: WEB - Marcom
Subject: FW:

I chose to email rather than call the FCC Commissioners.

-----Original Message-----

From: Matt James [mailto:matt.james@kolotv.com]
Sent: Friday, December 14, 2007 11:15 AM
To: Kevin.Martin@fcc.gov; Jonathan.Adelstein@fcc.gov; Michael.Copps@fcc.gov;
Deborah.Tate@fcc.gov; Robert.McDowell@fcc.gov
Subject:

Dear Chairman and Commissioners,

The proposals in the localism NPRM will create a whole new bureaucracy that will rob our daily, weekly, annual news and community service efforts of resources that are better spent serving our viewers. For nearly fifty-five years our television station has alerted, informed and entertained the people of Northern Nevada and Northern California. Through wild fires, floods and droughts we have been a primary source of information, helping our neighbors protect their lives and their property. We've supported community events and fund-raisers, we've helped collect food for the needy, clothing and dollars for disaster victims and we have covered every election for half a century, most recently providing air time for political candidates. We believe our resources are better spent producing twenty five hours of local news a week and airing thousands of public service messages every year rather than spending those resources on new reports that your agency has neither the time or resources to review. Our free enterprise system has put some of the best regulation possible into the right hands, the people of the United States. If we fail to do the job for our communities our viewers will regulate us by turning us off. Thanks for your consideration.

Matt James, GM
KOLO-TV
4850 Ampere Dr.
Reno, Nevada 89502
775-351-0201

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 2:28 PM
To: Hughes, Yvonne
Subject: FW: LOCAL SERVICE TO COMMUNITIES

-----Original Message-----

From: Sam Thomas [mailto:samt@wjth.com]
Sent: Friday, December 14, 2007 1:50 PM
To: WEB - Marcom
Subject: FW: LOCAL SERVICE TO COMMUNITIES

david this is the message i sent to all the commissioners keep up the good fight. we appreciate what you do SAM THOMAS WJTH RADIO

-----Original Message-----

From: Sam Thomas [mailto:samt@wjth.com]
Sent: Friday, December 14, 2007 1:47 PM
To: Jonathan.Adelstein@fcc.gov
Cc: Kevin.Martin@fcc.gov; Michael.Copps@fcc.gov; Deborah.tate@fcc.gov;
Robert.McDowell@fcc.gov
Subject: LOCAL SERVICE TO COMMUNITIES

WE SERVE OUR COMMUNITY EVERY DAY WITHOUT BEING REQUIRED TO BECAUSE THAT IS PART OF WHAT LOCAL RADIO IS ALL ABOUT. ANY ADDITTIONAL BURDENSOM REGULATION IS NOT NECESSARY AND WOULD TAKE UP TIME THAT CAN BE USED TO SERVE OUR COMMUNITY. AS AN EXAMPLE, WE HAVE JUST FINISHED A COAT DRIV THAT RAISED ENOUGH MONEY TO BUY OVER 500 COATS FOR KIDS IN OUR COMMUNITY THAT DO NOT HAVE AGOOD WARM COAT.

I URGE YOU TO NOT INPOSE ANY MORE REGULATIONS THAT WOULD ADD ,ORE BURDENS TO LOCAL BROADCASTERS.

THANK YOU FOR YOUR CONSIDERATION IN THIS MATTER SINCERELY SAM THOMAS, PARTNER & GM

WJTH RADIO
329 RICHARDSON RD SE
CALHOUN, GA 30701
PH. 706-629-6397

No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.5.503 / Virus Database: 269.17.2/1184 - Release Date: 12/14/2007
11:29 AM

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Checked by AVG Free Edition.

Version: 7.5.503 / Virus Database: 269.17.2/1184 - Release Date: 12/14/2007
11:29 AM

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 4:55 PM
To: Hughes, Yvonne
Subject: FW: New Localism Rules Proposal

From: Zack Fowler [mailto:zfowler@vidaliacommunications.com]
Sent: Friday, December 14, 2007 4:36 PM
To: Pigue Jere
Cc: WEB - Marcom
Subject: FW: New Localism Rules Proposal

Jere, I sent the following to each FCC commissioner. Of course, one never knows if the message gets past the horse holders.
Regards, zack

-----Original Message-----

From: Zack Fowler [mailto:zfowler@vidaliacommunications.com]
Sent: Friday, December 14, 2007 4:32 PM
To: 'Jonathan.Adelstein@fcc.gov'
Subject: FW: New Localism Rules Proposal

Commissioner Adelstein, we're a small broadcasting company in South Georgia with three stations. We have been operating since 1946 and could not have done so were we not serving our community. There are thousands more stations like ours who more than meet our public/community service obligations and do so gladly.

I appeal to you and the FCC not to re-impose burdensome regulations on us which will divert our efforts to serve our communities.

Please consider the impact of these proposals on our time and resources. We are already fighting to stay alive in the world of new media.

I invite you to check our web page at www.vidaliacommunications.com for a glimpse of the types of community service we provide.

Respectfully,
Zack Fowler, GM
Vidalia Communications Corp
912-537-9202

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 4:55 PM
To: Hughes, Yvonne
Subject: FW: Letter from Jim Carter/Pres&GM/WLKY-TV, Louisville, KY

From: Debbie P Roberson [mailto:droberson@hearst.com]
Sent: Friday, December 14, 2007 4:39 PM
To: Kevin.Martin@fcc.gov
Subject: Letter from Jim Carter/Pres&GM/WLKY-TV, Louisville, KY

Dear Chairman Martin:

I understand that The Federal Communications Commission is considering new rules which would turn back the clock and reinstate programming and reporting requirements for broadcast stations which were eliminated (rightfully so) more than 25 years ago. Broadcasters around the country serve their local community every day without the burdensome regulations under consideration.

WLKY-TV, Louisville, Kentucky is deeply committed to serving the residents of our viewing area. We express this commitment through our involvement in over 20 various initiatives, causes, and activities. Here are just a few of the ways we serve our viewers:

In 2000, WLKY partnered with Metro United Way for "Success by 6." The vision - to see that every child from conception to age six is healthy, safe, nurtured, and enters school ready to succeed. Six years later, it is stronger than ever, providing our community with the information and education necessary for the success of our youngest citizens. In 2006, WLKY aired a total of 277 30-second informational messages, two 30-minute specials, and four Saturday morning hotlines for a total on-air commitment of 11 hours, 19 minutes. WLKY researches, writes, and produces all messages and specials. This year's topics focused on early education and kindergarten readiness, health and nutrition, child care, and reading. In addition, WLKY produces Success By 6 hotlines, which bring local experts on children's issues together in our studio to answer viewer phoned-in questions.

In 1980 WLKY contacted the Kentucky Cabinet for Human Resources to see how we could help coordinate efforts to find adoptive homes for difficult-to-place children and Wednesday's Child was born. Airing every Wednesday on the news, the segment features a different child each week. Today WLKY is just as invested in Wednesday's Child as it was at its inception. The 2006 Adoption Fair included 15 agencies and had over 250 attendees. More than 6,000 pieces of information were distributed at the 2006 Kentucky State Fair. Over 550 people attended an Adoptive Family Fun Day, and 70 children were guests at the Wednesday's Child Christmas Party where each child received a gift he or she particularly wanted. Over the past 26 years, Wednesday's Child has placed nearly 2700 "special needs" children in adoptive homes and has become a valuable resource to our community for children and adoptive parents.

Conceived 30 years ago by WLKY, the Bell Awards is a recognition program honoring the outstanding volunteers in our community. Overseeing the awards is the WLKY-TV Spirit of Louisville Foundation, a non-profit organization with a board composed of 30 top community leaders. Revered as the most prestigious award of its kind in this area, it is presented each year to ten individuals in our viewing area who have shown the true "spirit of Louisville" through unselfish, humanitarian service. The station honors its yearly winners with an awards banquet and airs a one-hour, prime time program of the presentation with profiles of the winners.

Our coverage of community news and events includes the March of Dimes WalkAmerica, which we have sponsored and promoted for over 10 years. In 2006 WLKY fielded its own team and joined the 3000 other walkers to raise money to help prevent premature births.

WLKY meteorologist Jay Cardosi originated the Prader-Willi Walk five years ago to raise awareness of and funds for the genetic disorder Prader-Willi syndrome and he is instrumental in organizing this annual event. WLKY promotes the Walk and, in 2006, it raised close to \$50,000 locally for research.

Community event and premier fundraiser, the Light the Night Walk promotes blood cancer awareness and celebrates the lives of those who have battled leukemia, lymphoma, or myeloma. A staunch supporter and sponsor of the Light the Night Walk, WLKY supports the walk through PSAs and on-air coverage with anchor Vicki Dortch serving as Mistress of Ceremonies. In 2006, over 2,000 people participated in the Louisville Walk, which raised amost \$300,000 for research and patient services.

The outcome of a second joint endeavor between WLKY and Metro United Way is the 2-1-1 Call Service. This easy-to-remember number connects people with needed health and human services as well as civic involvement opportunities 24 hours a day, seven days a week with one confidential call giving access to resources across the community. 2-1-1 services 1.2 million residents in our 12-county, two state area. WLKY is the media partner for 2-1-1 providing continuing community awareness, education, and information through on-air messages and coverage within local newscasts throughout the day.

These are just a few examples of how WLKY serves our community. I strongly urge you not to turn back the clock and re-regulate local broadcasters. To impose burdensome regulations will adversely affect this station's ability to provide the very local service the FCC desires.

James J. Carter
President & General Manager
WLKY-TV
Louisville, KY



Debbie Roberson
Executive Assistant
WLKY-TV
502/891-4811
502/897-2384 Fax
droberson@hearst.com

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Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 4:35 PM
To: Hughes, Yvonne
Subject: FW: Notice of Proposed Rulemaking on Broadcast Localism
Importance: High

From: George DeVault [mailto:gdevault@hvbcgroup.com]
Sent: Friday, December 14, 2007 4:29 PM
To: Kevin.Martin@fcc.gov; Jonathan.Adelstein@fcc.gov; Michael.Copps@fcc.gov; Deborah.Tate@fcc.gov; Robert.McDowell@fcc.gov
Subject: Notice of Proposed Rulemaking on Broadcast Localism
Importance: High

Mr. Chairman & Honorable Commissioners,

It is our understanding that the Commission is scheduled to consider next Tuesday a Report on Broadcast Localism and a Notice of Proposed Rulemaking suggesting new rules for broadcasters.

As a broadcaster for over forty-six years, I vividly remember some of the so-called "localism" policies, which were in effect a third of a century ago. While those now defunct policies grew from lofty goals to create more localism in broadcast radio and television, in practice fulfilling the reportorial and procedural obligations they imposed took so much time and "person power" that the actual effect was to leave local broadcasters with significantly less time to actually devote to the very localism the policies were intended to promote.

Current specific program reporting requirements in radio and especially in television are more than sufficient to document the localism efforts of broadcast licensees.

I also understand that a return to the pre-1998 "main studio" rule is to be considered. The flexibility provided by the current rules on main studio location is conducive not only to operational efficiency, but also to having one's studio located "where things are actually going on." Further, the location of a station's studio means very little with regard to localism in an age in which more often than not the broadcaster takes the subject station's microphones and cameras to the local event or community leader rather than conducting the broadcast or telecast from the station's "main studio."

Finally, I understand the proposal raises questions about whether radio licensees should provide data on music aired including local music and on how play lists are compiled. Such a proposal is chilling indeed and smacks of the kind of government control of broadcasting one finds under a Communist or Fascist regime.

There is a time to de-regulate. We have lived through some of that time, and given the current competition from cable, satellite, and the internet, we should still be living in it. One thing is absolutely certain. Given the increased competition from new media for the eyes and ears of the general public, this is not the time for RE-regulation.

Respectfully yours,

HOLSTON VALLEY BROADCASTING CORPORATION
 Kingsport, Tennessee

George DeVault
George E. DeVault, Jr.
President

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 4:35 PM
To: Hughes, Yvonne
Subject: FW: REPORT ON BROADCAST LOCALISM AND NOTICE OF PROPOSED RULEMAKING ON DEC 18TH MEETING AGENDA

From: Taylor, Dick [mailto:DickTaylor@clearchannel.com]
Sent: Friday, December 14, 2007 4:31 PM
To: kevin_martin@fcc.gov; jonathan_adelstein@fcc.gov; michael.copps@fcc.gov; deborah.tate@fcc.gov; robert.mcdowell@fcc.gov
Subject: REPORT ON BROADCAST LOCALISM AND NOTICE OF PROPOSED RULEMAKING ON DEC 18TH MEETING AGENDA

Dear FCC Commissioners:

I apologize for not making this email more personal, but I just returned from a LOCAL Community Event saluting the best people in our community that make Sussex, New Jersey the best place to live, work and raise a family to find a notice that the FCC will be considering a new rule making on Tuesday that will encumber local broadcasters with ton of reporting requirements.

Say it isn't so!

Here in Sussex, New Jersey we work hard every day to super serve our community. We provide comprehensive traffic reports (84% of our community commutes to work outside of our county every day), local news and weather information. In fact, we have already had FOUR (4) Major Snow Events this year and winter on the calendar hasn't even arrived yet. But weather IS a very important LOCAL event here in the mountains of New Jersey and our area depends on the very latest information regarding road conditions, school closings/delays etc. And we're there for them.

Being a ski area, weather conditions on the slopes is important too.

When it comes to entertainment, we've invited local bands to perform LIVE on our airwaves, as well as compete in our annual "Battle of the Bands" competition.

We not only promote our weekly Public Affairs programs, but publish what's coming up on our broadcasts on our web sites and then offer the broadcasts as a podcast for a week following the over-the-air broadcasts.

Here's what's coming up this weekend:

Issues & Ideas

Sue Collins, from New Jersey Alliance For Informed Choice In Vaccination, will comment on the state's plan to mandate parents have their children vaccinated and what risks this program overlooks.

Deborah Berry-Toon, from Project Self-Sufficiency, will discuss how their programs and services will be expanded along with their office locations.

David Ragan, NASCAR driver and Rookie Of The Year, will talk about how people should always slow down and move over when they come upon a roadside emergency crew assisting a disabled vehicle.

Lisa G, TV and radio personality, will introduce a high tech watch for children that doubles as a tool that prevents child abductions.

Trita Parsi, from the National Iranian American Council, will talk about what the recently released U.S. intelligence report that stated that Iran stopped their nuclear weapons program should offer as guidance for future U.S. and Israeli foreign policy.

NJ Newsmakers

Assemblywoman Alison McHose (R-24th) will talk about Gov. Jon Corzine's school funding plan, the new ruling that mandates all parents must have their children vaccinated and how some communities can have others take their affordable housing requirements.

Donna Traylor, Director of Sussex County Farmland Preservation, will discuss the work of her department and how their efforts may be improved upon via increased state funding.

Burdensome regulation is NOT necessary and will harm my ability to provide the very local service the FCC wants. There are only so many hours in a day and I'd rather spend it helping our community than trying to maintain a mountain of documents; that would be in addition to the Public File, Political File and EEO File.

I can not urge you strongly enough to NOT turn back the clock and re-regulate local broadcasters.

Thank you for listening.

Dick

**Dick Taylor, CRMC
Market Manager,
WSUS/WNNJ AM-FM/Max 106.3
Clear Channel Radio Tri-State
45 Mitchell Avenue
Franklin, NJ 07416
973-827-2525/Fax: 973-827-2135**

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 4:35 PM
To: Hughes, Yvonne
Subject: FW: Localism NPRM - URGENT

From: Guy Hempel [mailto:Guy.Hempel@foxcarolina.com]
Sent: Friday, December 14, 2007 4:03 PM
To: WEB - Marcom
Subject: RE: Localism NPRM - URGENT

Sent the following to the chairman and each commissioner this afternoon.

Commissioner Adelstein

I understand that the FCC is considering a Report on Broadcast Localism in your meeting on Tuesday, December 18. I understand that the proposal in the localism NPRM would reinstate programming and reporting requirements that were eliminated 25 years ago. As a broadcaster with 34 years experience, who remembers those rules, I can assure you that we take localism just as seriously today as we did back then. We still run PSAs on a daily basis. We still support a number of local charitable organizations. I personally serve on four local community boards or committees. In the last election we donated free time to local politicians. In the past two years we have added four hours of daily local news – twenty hours per week. We have plans to add another thirty minutes of daily local news next fall.

The market dictates that we be local. The market dictates that we be responsible local community citizens. Our audience expects it. Our advertisers expect it. It is just good business.

The only thing that new rules will create is more paperwork; paperwork that was not necessary 25 years ago and paperwork that is certainly not necessary today.

I ask you to look at the collected works of local broadcasters and consider them on merit. When an ice storm hits Greenville, South Carolina, all stations in the area stay on the air providing the audience with important information. When schools are closed, the audience looks to us for information. When hurricanes hit the coast and move inland, all broadcasters in the area provide important safety information. We do it because we are local broadcasters, and that is simply what we do.

I urge you not to re-regulate local broadcasters. It is not needed and will create an unnecessary financial burden on my station.

Thank you for your consideration.

Guy Hempel

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 4:35 PM
To: Hughes, Yvonne
Subject: FW: Report on Localism and NPR

From: Jerry Zimmer [mailto:jzimmer001@charter.net]
Sent: Friday, December 14, 2007 4:27 PM
To: David, John; WEB - Marcom
Subject: Fw: Report on Localism and NPR

fyi
----- Original Message -----

From: Jerry Zimmer
To: [Deborah Tate](#) ; [Robert McDowell](#) ; [Michael Copps](#) ; [Jonathan Adelstein](#) ; [Kevin Martin](#)
Sent: Friday, December 14, 2007 3:18 PM
Subject: Report on Localism and NPR

Dear Commissioners,

I've been a small-market and large market radio broadcaster and owner for the past 35 years.

I've been informed that you are considering an NPR on localism for broadcasters. You folks need to get out of Washington once in awhile and go to any of the thousands of communities across the country and listen to a local radio station or watch a local television and you'll see and hear local all over the place. How do you think we compete with all the cable channels and satellite radio channels? By being local! Right now we're collecting clothing and food all across the nation for the less fortunate in our country. Helping displaced folks from floods, ice-storms, tornados, and other calamities that effect our communities.

If you want to know about localism without even leaving Washington, just pick up the phone and call the mayors, civil organizations, charities, United Ways, and hundreds of other community events across the country. Call our state, and federal senators and representatives and ask them if broadcasters are doing local things and serving our listeners. We have to, otherwise we won't be around much longer.

I strongly urge you not to turn back the clock for more government regulation and re-regulate us again. Burdensome regulation on broadcasters is just not necessary and only will divert my limited time and resources as a small businessman.

Sincerely,

Jerome Zimmer
President
Great Plains Media, Inc.
Cape Girardeau, MO...Lawrence, KS...Bloomington/Normal, IL
OF 573-651-0707
Fx 573-651-0707

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 4:35 PM
To: Hughes, Yvonne
Subject: FW: Re-regulation

From: Bobby Edwards [mailto:bedwards@wxv25.com]
Sent: Friday, December 14, 2007 3:54 PM
To: Kevin.Martin@fcc.gov
Cc: Jonathan.Adelstein@fcc.gov; Michael.Copps@fcc.gov; Deborah.Tate@fcc.com; Robert.McDowell@fcc.gov
Subject: Re-regulation

Dear Commissioners,

It is my understanding that the Federal Communications Commission has announced that it will consider a Report on Broadcast Localism and Notice of Proposed Rulemaking suggesting new rules for broadcasters at its meeting on Tuesday, Dec. 18, 2007.

We understand that proposals in the localism NPRM would turn back the clock and reinstate programming and reporting requirements eliminated more than 25 years ago. The proposals include establishing community advisory boards, specific program reporting requirements and a return to the pre-1998 main studio rule.

We as broadcasters are serving our local communities twenty-four hours every day. We strongly believe that more regulation of this type will hinder my ability to provide the local service that the FCC and our station want to provide. We strongly urge you not to turn back the clock and re-regulate local broadcasters such as ourselves.

Thank you,

Bobby Edwards

General Manager

WXXV TV FOX-25

Gulfport, Mississippi

(228) 832-2525 Office

(228) 297-6900 Cell

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 4:35 PM
To: Hughes, Yvonne
Subject: FW: Report on localism of Broadcasting

From: Lowell Davey [<mailto:LDavey@bbnradio.org>]
Sent: Friday, December 14, 2007 3:41 PM
To: WEB - Marcom
Subject: Report on localism of Broadcasting

"Forward at your discretion."

**Chairman Martin
Advisor Michelle Carey**

Dear Sir:

We are greatly concerned about the proposal to report on the localism in broadcasting of 25 years ago. One of our great freedoms is "Freedom of the Press". No doubt the variety of material filling the airwaves today give the American people the privilege of choice. No nation in the world is so saturated with information of happening as we are. It would take a great stretch of the imagination to believe people are not aware of local happening with all the local news, local program shared hourly in almost every community today. Any local crisis or positive happening is grabbed today by the media and presented repetitiously in the communities of the area.

Today we have multiplied the mass media many times over in cities and towns and communities. Multiple Television and radio stations have been added to the big picture. Compared to 25 years ago few today not only hear the news but see it. New TV station, new radio stations and new newspapers and magazines fill the mail boxes every day on local events and happenings in every community.

Twenty Five years ago we went through the endless debate on local groups evaluating the media. Boards and groups were called forth to require the media to issue reports and specific programs and issues validated. Was that information really beneficial to the community? Did people really ask or reviewed the material. No. To consider a return to those requirements would be like grounding all the Jet Aircraft and going back to the propeller driven planes. A few would like it but the majority knows it would send traveling into a tail spin.

Sincerely

Bible Broadcasting Network

Dr. Lowell Davey, President

Hughes, Yvonne

From: WEB - Marcom
Sent: Friday, December 14, 2007 4:35 PM
To: Hughes, Yvonne
Subject: FW: "Locally Oriented Programming"

-----Original Message-----

From: Charley Johnson [mailto:charleyj@kvlytv11.com]
Sent: Friday, December 14, 2007 3:40 PM
To: kevin.martin@fcc.gov; jonathon.adelstein@fcc.gov; michael.copps@fcc.gov; deborah.tate@fcc.gov; robert.mcdowell@fcc.gov
Cc: MARCOM@nab.org.; STATE-ND Helfrich, Beth; 'Eric Van den Branden'; 'Rich Adams'
Subject: "Locally Oriented Programming"

Commissioners: I know you're busy so I'll try to be brief. I understand you are considering a NPRM regarding localism. Every local television station I know of, and certainly all of us in the Fargo-Valley City market, already provides significant amounts of local programming.

On our NBC & CBS affiliates, we provide three hours of local news, weather and sports every weekday, as well as morning cut-ins and evening newscasts on weekends. We produce a health program monthly on KVLV, featuring doctors from a Fargo hospital and phone call questions from viewers. We are actively considering adding a similar show (not "repurposing" the same one) on KXJB.

On KVLV, from October into June, we broadcast a knowledge bowl-style tournament called "High School Challenge" every Saturday night. It features teams from 32 high schools in our viewing area. Also on KVLV, we carry 45 hours worth of North Dakota State High School basketball (girls & boys), hockey and football tournaments. This fall we produced and carried the local college football game between Moorhead, MN rivals Minnesota State University-Moorhead and Concordia College, and three games featuring our local Division 1AA football team, North Dakota State University. During the football season, we produced and carried the NDSU Coach's show for eleven weeks on KXJB.

This is all in addition to providing continuous coverage, as necessary, of important local weather and news developments whenever they occur.

We have complied with FCC rules and regulations by documenting issues of importance to the communities in our DMA, and filing quarterly reports on what we've done to illuminate those issues. It's my humble opinion that we don't need further rules and requirements to make sure we provide local programming-- it's what we do. It's what sets us apart from five hundred channels on cable and satellite. It's what keeps us connected to our communities-- communities where we all live, work and play. Our staff members--news, weather, sales, programming, engineering, management-- answer the phone when viewers call to comment, complain or ask questions. We're nothing without them, and we understand that they count on us, not only for ER and CSI, but for important information that, in some cases, can mean the difference between life and death. Every new requirement you put in place, every new report we have to fill out, means one of our staff members has a little less time to work on some of that local programming, or respond to a local question or comment. I understand that some level of reporting is important, if for no other reason than to make sure we respect all the issues I've mentioned above. But I hope you understand that there can be a fine line between reporting that's necessary for oversight and reporting that's onerous and burdensome. Please do not act hastily to impose new requirements that would fall into the latter category.

Thank you for your time, and your dedication to public service.

Charley Johnson
General Manager
KVLV & KXJB-TV

Box 1878
Fargo, ND 58107
PH: 701-237-5211
CE: 701-371-9911
FX: 701-237-6576
E-mail: charleyj@valleynewslive.com
www.valleynewslive.com

Hughes, Yvonne

From: WEB - Marcom
Sent: Monday, December 17, 2007 8:58 AM
To: Hughes, Yvonne
Subject: FW: NPRM-Report on broadcast localism

From: Tony Coloff [mailto:kiowfm@wctatel.net]
Sent: Friday, December 14, 2007 5:11 PM
To: WEB - Marcom
Subject: Fw: NPRM-Report on broadcast localism

copy to David K. Rehr;
sent to the chairman and all commissioners
From: Tony Coloff, KIOW, Forest City, Iowa
Chairman Martin:
Advisor Michelle Carey
Federal Communications Commission

Dear Sir:

I understand you are considering a proposal in the localism NPRM that would reinstate programming and reporting requirements.

I would strongly urge you not to do that.

I have owned and programmed this radio station for nearly 30 years. It is in one of the smallest population markets, but yet we provide an enormous amount of local service, and do it every day.

I remember the reporting requirements we had to comply with 30 years ago. The relief that we got from that requirement 25 years ago, took away the regulation burden and allowed our limited staff resources to provide even more local programming than we were doing before. And we have been providing that improved localized programming for the past 25 years. The paperwork and reporting requirements that were done away with then, benefitted the production of localized programming in many ways.

It is sheer folly to reimpose reporting requirements. That only makes us devote precious time to reporting and takes away resources from doing the actual localized programming we need to do, and you want us to do.

I could go into further detail on the many ways on how we provide local service, if you would let me know you needed it.

Also, a brief word on music programming. Our music is picked and mixed locally. Songs are picked on artistic merit only, by our local program director, with local area input from requests to the radio station and comments to the staff by listeners out in the area. We play local talent every chance we get, again according to artistic merit only.

Again, I can go into a lot greater detail, if you will only let me know that you need this information.

If you reestablish reporting requirements, you are only hurting localized radio stations like mine, because of my time and my staffs time spent in reporting, all time taken away from developing the local programming, news, weather, sports, interviews, public affairs, localized psa's, a localized music playlist, and much more. Localization takes much time, talent, and thus money, because THIS TAKES MUCH TIME!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!

Please call on me for details on any of these areas--I have seen it all and I continue to do it all at age 66.

Thank you for you consideration.

Tony Coloff
Pres/Gen Mgr
Pilot Knob Broadcasting, Inc.
KIOW FM-107.3
18643 360th St.
Box 308
Forest City, IA 50436
Ph: 641-585-1073
Fax: 641-585-2990
Email: Tony@kiow.com

Hughes, Yvonne

From: WEB - Marcom
Sent: Monday, December 17, 2007 8:58 AM
To: Hughes, Yvonne
Subject: FW: Localism NPRM

From: Rich Morgan [mailto:morganclan4@verizon.net]
Sent: Friday, December 14, 2007 5:11 PM
To: Robert.McDowell@fcc.gov; Deborah.Tate@fcc.gov; Michael.Copps@fcc.gov; Jonathan.Adelstein@fcc.gov; Kevin.Martin@fcc.gov
Subject: Localism NPRM

Chairman Martin and Commissioners,

I understand that on December 18, 2007 you will be considering a Report on Broadcast Localism and Notice of Proposed Rulemaking. I strongly urge you not to turn back the clock and re-regulate local broadcasters. Burdensome regulation is not necessary and will harm my ability to provide the very local service the FCC wants. I believe that broadcasters are serving their communities everyday. One of our stations received a national award in 2004 for service to our community and that same station just this week completed it's 20th Christmas Wishes Radiothon that directly benefits our areas most needy children. Thank you for your time.

Rich Morgan
President
Real Media Inc.
WRAR FM
WNNT FM
P.O. Box 1023
Tappahannock, VA 22560

Hughes, Yvonne

From: WEB - Marcom
Sent: Monday, December 17, 2007 8:58 AM
To: Hughes, Yvonne
Subject: FW: Broadcast Localism Proceeding

From: Christopher G. Wood [mailto:cwood@UNIVISION.NET]
Sent: Friday, December 14, 2007 5:46 PM
To: WEB - Marcom; Mago, Jane
Subject: Broadcast Localism Proceeding

FYI, this was sent today on behalf of Univision Communications

Christopher G. Wood
 Vice President and Senior Legal Counsel
 Univision Communications Inc.
 5999 Center Drive
 Los Angeles, CA 90045-0073

310/348-3696 PH
 310/348-3679 FX
 cwood@univision.net

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From: Christopher G. Wood
Sent: Friday, December 14, 2007 2:29 PM
To: Kevin.Martin@fcc.gov; Jonathan.Adelstein@fcc.gov; Deborah.Tate@fcc.gov; Michael.Copps@fcc.gov; Robert.McDowell@fcc.gov
Subject: Broadcast Localism Proceeding

Chairman Martin
 Commissioner Adelstein
 Commissioner Copps
 Commissioner McDowell
 Commissioner Tate

Dear Mr. Chairman and Commissioners:

On behalf of the Univision Communications television and radio stations, I am writing to express our concern over reports that the Commission may embark on a new regulatory path that could undermine our stations' ability to best serve their local communities. The Univision stations have long strived to work with their local community leaders to meet both the programming and non-programming needs of our local audiences, particularly the local Hispanic community. Based upon years of experience with our communities, we believe that a one-size-fits-all approach to community service is not effective.

We therefore urge you to exercise caution in imposing overly restrictive limits on broadcast

stations' flexibility in serving their local communities.

Respectfully,

Christopher G. Wood
Vice President and Senior Legal Counsel
Univision Communications Inc.
5999 Center Drive
Los Angeles, CA 90045-0073

310/348-3696 PH
310/348-3679 FX
cwood@univision.net

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Hughes, Yvonne

From: WEB - Marcom
Sent: Monday, December 17, 2007 8:58 AM
To: Hughes, Yvonne
Subject: FW: Contact the FCC - Localism NPRM - URGENT

From: BOUCHARD8@aol.com [mailto:BOUCHARD8@aol.com]
Sent: Friday, December 14, 2007 5:16 PM
To: WEB - Marcom
Subject: Re: Contact the FCC - Localism NPRM - URGENT

Thanks for the alert, I wrote the following to all 5 commissioners, it got to me just before 5 PM, hope I was not too Late. Dick Bouchard WNRI

We are a small AM station. Owned by just 4 people who have been in broadcasting for over 100 years combined.

We make every effort to provide as much public service as possible. We currently are paying 6 mortgages and loans and we just about breaking even.

The surging costs of electricity, staffing (\$7.40 an hour in RI is the minimum wage), insurance, fuel oil, taxes, fees and everything else we use, is spiraling upwards!

We provide open microphones to community leaders and broadcast at least 7 hours a day of local programming, and just today, ran hundreds of announcements due to the big snow storm. But our low power at night and high costs of labor would force us to leave the air at night, something that we think would not be in the best interests of our community.

We respectfully request that the FCC not return to the days of the past when radio stations were flush with money. We are among the majority of stations who will not be able to provide the service we provide, if forced to have manpower in the station during evening and overnight hours.

Sincerely,

*Richard A. Bouchard W1HQV
Bouchard Broadcasting, Inc.
DBA WNRI AM Member: NAB
Woonsocket, RI (City of about 43,000)*

See AOL's top rated recipes (<http://food.aol.com/top-rated-recipes?NCID=aoltop00030000000004>)

Hughes, Yvonne

From: WEB - Marcom
Sent: Monday, December 17, 2007 8:58 AM
To: Hughes, Yvonne
Subject: FW: Localism NPRM

From: Drain, Sylvia [mailto:SylviaDrain@clearchannel.com]
Sent: Friday, December 14, 2007 6:37 PM
To: Kevin.Martin@fcc.gov
Subject: Localism NPRM

Chairman Martin:

Markets don't get a whole lot smaller than Bozeman, MT. And, I don't know what problems you face with localism in New York... but I couldn't be more proud of what we do to serve our community. More regulation is not the answer.

We offer interview formats for discussion of community issues, we raise awareness and funds for worthy community causes and non-profit organizations and we just met with our new county emergency coordinator to make certain he knew how to reach us 24/7 to get vital information out to the community. Our group has six different signals with six different formats to provide variety and options for listeners. We offer very little satellite or syndicated programming compared to our competitors, meaning relevance and jobs for the community. We operate with a lean staff and use available technology to stretch our local pool of talent across all six stations. And, like I said... we aren't here 24/7, but you'd never know it if you tuned in and in an emergency we have the technology and contact points to get the word out. I can't afford, let alone find, someone to work overnights.

We are very serious about our commitment to the communities we serve. More regulation won't help us serve these communities better. In our case, more red tape could add layers of paperwork and procedures that would cause an undue burden.

Like I said, I'm proud of what we do here in Bozeman, MT with a small, committed staff and technology. We get it done. We get it done efficiently. And, we get it done effectively.

Sylvia R. Drain, Market Manager

GAPWEST Broadcasting - Bozeman

KMMS AM/FM KISN FM KXLB FM KZMY FM KPRK AM

125 W. Mendenhall - Bozeman, MT 59715

PH (406) 586-2343 x3011 - FX (406) 587-2202

sylvia@clearchannel.com (temporary)

Hughes, Yvonne

From: WEB - Marcom
Sent: Monday, December 17, 2007 8:58 AM
To: Hughes, Yvonne
Subject: FW: NPRM on Localism- Morgan Murphy Media

-----Original Message-----

From: Scott Chorski [mailto:schorski@wkbt.com]
Sent: Friday, December 14, 2007 6:15 PM
To: WEB - Marcom
Subject: FW: NPRM on Localism- Morgan Murphy Media

David, Liz asked that I forward this to you. Scott

-----Original Message-----

From: Liz Burns [mailto:embtreo@embtv.com]
Sent: Friday, December 14, 2007 5:04 PM
To: Scott Chorski
Subject: RE: NPRM on Localism- Morgan Murphy Media

You go guy!

-----Original Message-----

From: "Scott Chorski" <schorski@wkbt.com>
To: kevin.martin@fcc.gov; jonathan.adelstein@fcc.gov; deborah.tate@fcc.gov;
robert.mcdowell@fcc.gov; michaelcopp@fcc.gov
Cc: "Elizabeth Burns" <emb@embtv.com>
Sent: 12/14/07 3:57 PM
Subject: NPRM on Localism- Morgan Murphy Media

On behalf of Elizabeth Murphy Burns, I write you all from WKBT-TV in La Crosse, Wisconsin. Please review the attached as examples of our deep commitment to local programming and the community issues of this beautiful area. In every example you will find us addressing a major community concern. In 3 of the 4 examples, it was a request initiated by the community. In the case of our Connect With Kids efforts, the subjects of Bullying and Underage drinking were chosen as a result of 2 focus groups with local educators.

At least once every 2 years, we conduct an extensive phone survey of over 500 households to determine whether we are still covering the content areas of high interest to our viewers. At least 5 staff members of WKBT sit on various board of directors of key community service agencies. If you polled key community leaders, I trust you would find that new regulations for programming and reporting requirements are not necessary for local broadcasters <<Localism NPRM.doc>> going forward.

Sincerely Yours,
Scott Chorski, VP, GM WKBT-TV

Hughes, Yvonne

From: WEB - Marcom
Sent: Monday, December 17, 2007 8:58 AM
To: Hughes, Yvonne
Subject: FW: Paul Tinkle from Tennessee writing

-----Original Message-----

From: ptinkle@crunet.com [mailto:ptinkle@crunet.com]
Sent: Saturday, December 15, 2007 8:57 PM
To: WEB - Marcom
Subject: Paul Tinkle from Tennessee writing

David, I'm sure you're up this weekend.
Here's a letter I sent to Commissioners.
Paul Tinkle ptinkle@crunet.com
Good luck.. Paul

Kevin Martin, Chairman
The FCC
Washington, DC

12/15/07

Dear Chairman Martin,

I'm a small broadcaster here in Weakley and Obion County Tennessee. You likely won't remember member me, but we've met a couple of times including the Service to American program sponsored by NAB about the time your father passed away. You were very kind to talk with me.

Chairman Martin, here in our rural area, our radio stations air programs like The Pet Patrol, The Swap Shop and funeral notices, we air 17 local news casts per day, we play local artist new recordings on our radio stations, broadcast local high school football and basketball games in addition to airing programs that includes a public affairs show called "30 Minutes" where we interview a local news maker or group. We also air a public affairs program called 30 minutes and one of those was about the digital transition for HD TV explained by TAB President Whit Adamson. We allow everyone with an important message to come on that show, and would welcome you to be on the air with us also.

Yes we do a lot of community service. If you want to call in a birthday or anniversary or tell us about a friend in the nursing home, you can get on the air on one of our radio stations. Our company is about community service. It's what we do here Mr. Chairman. This month we brought in over 200 coats for the needy, collected over 10,000 cans of food from our local school system to feed the hungry and raised \$5,000 in two hours for mentally handicapped adults recently.

I could go on but sir, but to summarize we focus our time helping our community EVERYDAY, document it in our public file and play by the Commission's rules.

The rules that are in place don't need changing. We are continuing to make a difference in our local communities every single day when we air a public service announcement for the Rotary club's ham breakfast or a school's womanless beauty review to raise funds for an athletic team. I appreciate you reading my letter and understanding that community broadcasters who have been granted a license understand the need to perform community service. If we didn't, our advertisers wouldn't support us and I wouldn't be writing you this letter to tell you that I care about the future of local radio.

Mr. Chairman, God Bless and thank you for your leadership. I appreciate your understanding of where we local community broadcasters stand in being good public servants to our listeners.

Paul F. Tinkle, President
Thunderbolt Broadcasting
Martin, Tennessee WCMT AM,
WCDZ FM WYVY FM WQAK FM WCMT FM