

Dear Commissioner,;

We understand that the FCC has undertaken a "localism" initiative that may substantially change how we manage our station, including our interaction with our community, the programming we broadcast, and allocation of administrative and financial resources.

Although the initiative may be directed at commercial broadcasting, the Localism Report and Notice of Proposed Rulemaking (NPRM) make no distinction between commercial and noncommercial educational (NCE) stations. Therefore the rules changes the Commission ultimately adopts will needlessly apply to both commercial and NCE stations.

It is imperative that the FCC fully understands the potential impact of the proposed changes and why additional regulatory compliance obligations would not be helpful and may be harmful to our station.

“Localism” is often mistakenly seen as the holy grail of our new media age. As we know, “localism” isn’t a final destination, but a component – a very important component - in addressing the information and programming needs of our communities. Prescribed, specific definitions of programming requirements will undermine the flexibility and creativity so important to the work of our stations.

Community Roots

Our station is locally owned, controlled, staffed and programmed. We are a non-profit station licensed to Spring Hill College, a Jesuit school in Mobile, Alabama. We have a local Board of Directors apart from that of the College, public board meetings and are dependent on the financial support of our listeners.

We have many current relationships with local arts and community organizations. and we function as a **local institution** that serves local needs.

We strongly question the need for new FCC regulatory requirements for the following specific reasons:

- Our station, as a non-commercial educational radio entity, is inherently local. As a non-profit organization, owned by a private educational institution, our station's mission is to serve the educational, informational, and cultural needs of my community.
- My station's governance includes significant public participation because my station's board of directors features public board members and the meetings are open to the public.
- I ascertain my community's needs through a variety of mechanisms, including those broadly representative of my community, listener surveys conducted via mail, the Internet, and other means of listener input,

including participation of station personnel in other community institutions and activities.

- Most of all, my station's continued success is inextricably linked to individual listeners in my community voluntarily deciding to make significant financial contributions to their station.

Community Service

- Our public radio station strives to provide quality, in-depth programming to listeners in our area. We do that through a mix of programming we produce locally as well as programming we obtain from regional and national producers. The programming features news and public affairs, political coverage, and local arts and cultural news and entertainment.
- We customize our broadcasts of NPR and other programming providers by inserting our own local news reporting.
- We air concerts by the local symphony orchestra and opera company
- We air live concerts from our on site performance studio featuring local musicians.
- We use our web site to supplement and augment our over-the-air program services. We stream our over-the-air programming for the benefit of those who are better able to access our services by that means.
- We also take advantage of the Internet's unique capabilities. For instance, we use our web site to build on our local programming by providing access to expanded interviews, transcripts, pictures, and links to additional resources.
- We also use our web site to offer Internet-only content.

Underserved segments of our community

- Our station provides a 24 hours a day, seven days a week radio reading service for the blind, which is a life-line of news and information for individuals historically underserved by traditional media.
- With the advent of HD radio and multicasting, we are planning to expand our offerings on the reading service to the entire state.
- We also offer special children's programming on air and via a series of classical concerts in schools.

Increased Regulatory Burdens

- As a public, non-profit educational organization that depends for its continued existence on serving my community, my station does not need any new regulatory obligations to fulfill its public service mission.

- In the case of stations like mine, the FCC's goal of enhancing localism will be best served by maintaining the existing flexibility we have to serve the needs and interests of our listeners.
- Requiring each station to maintain a main studio in its community of license and the presence of station personnel during all times of operation may appear to promote localism, but it would likely have the opposite effect in the case of my station.
- This would force us to reallocate resources away from developing and acquiring locally responsive programming. If these changes are adopted, we may well have to reduce our hours of operation or consider abandoning operations in underserved, rural and other remote areas.
- Likewise, imposing mandatory minimum program origination obligations, enhanced disclosure requirements, and new license renewal processing guidelines will increase our administrative costs at a time when we are already under-resourced and increasingly stretched thin financially.
- Just as importantly, our community is best served when a locally owned, staffed, and programmed station such as ours, rather than the FCC, determines the appropriate mix of local, regional, and national programming.
- Therefore, in the interest of localism, we implore the FCC to exempt public radio stations such as mine from any of the proposed new regulatory burdens.

Sincerely,

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