Many years ago the FCC relaxed some regulations, because technology is more stable now than in earlier years. Broadcasters have been allowed to monitor their station remotely as well as doing many procedures with the use of computers. In a highly competitive marketplace and with overhead often increasing faster than revenue, broadcasters must use technology to enable us to better serve the public while operating within a strict budget. Now broadcasters are challenged even more with new competition such as I-pods, satellite radio, internet radio, etc. Add to that today's weakening economy, and broadcasters face escalating challenges. I am concerned that these proposed regulations would force many broadcasters to make major reductions in service while trying to operate within their already restrictive budget.

Please keep in mind that the vast majority of broadcasters have always been dedicated to serving persons who live in their city of license. This is evidenced when severe storms, snow, ice storms, tornados, floods, hurricanes and other natural disasters impact their community. When this happens, broadcasters stop regular commercial programming and devote 100% of airtime to passing information from emergency authorities. Broadcasters are here to take the public's hand and be with them through the storm or other emergency. You never know what time of the day or overnight when these emergency situations might occur.

In the old days when a person had to physically be at the station during all on-air hours, many stations would sign-off the air at 10:00pm nightly. This was strictly keep the station's operation within its budget. Now, stations are controlled remotely, and therefore able to broadcast 24/7. If a storm or other emergency arises, current technology enables broadcasters to stop regular programming remotely and air emergency information.

If broadcasters are forced to sign-off at 10:00pm in order to stay within the operating budget, it would not be on-the-air for many emergencies. Thus, the public would not have a local 24/7 source of emergency information. This is even more crucial in small market stations.

For stations to survive and serve the public, they must generate enough money to cover their overhead. Placing additional paperwork and manpower requirements on broadcasters forces management to shave services that benefit the public in order to cover the expenses of complying with new regulations.

Furthermore, these proposed regulations come at a time when the economy is shaky. A station's overhead would increase dramatically, if regulations were in place that required a person to be on property during all broadcast hours. Many broadcasters would have to reduce on-air hours in order to control overhead. Instead of being on the air 24/7, small market broadcasters would sign-off nightly at 10:00pm as they did in the early days when there were similar regulations.

Adding regulations during an unstable economy could force many broadcasters to take persons who are covering city council meetings, doing high school sports broadcasts and other locally focused programming to instead do "in house baby sitting with equipment" simply to have someone physically at the station during on-air hours.

For the safety of citizens served by local broadcasters, we plea that the Commission refrain from imposing stricter regulations, especially during times of economic uncertainty.

Respectfully submitted,
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