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TO: FAA
Subject: Proceeding 04-233

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Please keep FREE SPEECH FREE and don't tamper with Christian and religious programming!

You are considering rule changes that could force Christian radio stations to either modify their messages or be forced from the air.

Although not directed specifically at those using the airwaves to disseminate the Good News of the Gospel, potential rule changes could put Christian Broadcasters in an untenable position. If enacted, the proposals could force Christian radio programmers to either compromise their messages by including input from those who don't share the same values, or to run the risk of costly, long and potentially ruinous government inquiries.

Specifically, the you are considering a proposal that would force every radio station to take programming advice from community advisory boards broadly representative of an area's population. That means that Christian broadcast stations could be forced to take programming advice from people whose values are at odds with the Gospel! A well organized group of atheists, abortionists or secular humanists could demand representation - and have standing to cause trouble at the FCC if they were turned away.

Any Christian Broadcaster who stands up to the pressure and refuses to compromise on matters of conscience, could find his or her station's license renewal tied up for many years as your officials consider complaints and allegations over nothing more than the station's chosen broadcast message!

Among the proposed new regulations are requirements that stations report, every three months, how much programming of various types has been broadcast, who produced it, and how it reflects the interests of a cross-section of local residents - even those who do not share Gospel values.

If enacted, such requirements will give Christian Radio's opponents powerful new tools to harass and possibly silence Gospel inspired voices. Armed with these reports, adversaries can file complaints with the FCC against Christian Broadcasters who refuse to compromise on Gospel principles; any Christian Station that insists on only pure Gospel programming could be made to pay a high price for its refusal to yield airtime to those with other messages.

One proposed variation would even force stations to grant a certain amount of airtime to any group that requests it - much like cable television systems make time available on "public access channels." But unlike public access channels, which were created as a kind of open public forum, Christian Radio is a combination of pulpit and mission. The government cannot force messages from any pulpit, nor insist that missionaries promulgate viewpoints contrary to the Gospel. The same way, it should not be forcing Christian Radio stations to deliver the messages promulgated by secular humanists, abortionists or atheists. You are also considering ways it could increase its coercive powers to force speech on unwilling broadcasters. Even a station that avoided sanctions during a typical eight-year license term could find its license renewal challenged. While this has long been true, in recent years, the delays caused by these challenges were usually more of a nuisance than a disaster, as skilled civil service professionals worked through issues. These government experts had authority to apply reason, and ultimately granted almost every renewal presented.

But you are considering a renewal processing procedure that would take renewal-granting power out of the hands of qualified civil servants when a Christian station, in good conscience, has kept its message pure and not allowed its facilities to be used to promulgate other messages. Instead of routine processing by civil servants, such a station's renewal application will be subject to the often multi-year process of review by the politically-appointed FCC commissioners.

Not only will such a designation make a license renewal more time-consuming, but also more costly to obtain; Christian Broadcasters facing such a process will likely need greater assistance from lawyers and other consultants - added expenses that could prove ruinous.

Finally, you are also proposing to drive up the costs of providing Christian Broadcasting services by eliminating labour-saving technological enhancements that make it possible to operate radio stations, at least part of the time, without an employee on the premises.

Although such un-staffed operations have been the norm for years, you are considering a rule to require staffing whenever a radio station is on the air - even if all the programming at that time is delivered by satellite. God's love may be free to all, but getting the word out will become even more expensive - perhaps too expensive for some radio stations.

You are also considering a proposal that would force many Christian stations to relocate their main studio facilities. Now, it is possible to serve several missions from one location. But under this proposal, many co-location arrangements would be forced to end - raising daily operating costs and imposing immediate expenses related to moving, construction of other facilities and overseeing forced relocations.

When coupled with the rapidly rising costs of broadcasting, including multiplying electricity expenses, extended staffing requirements and forced relocations will leave some Christian Broadcasters with little choice: either cut back or give up.