

I would like to comment on the localism efforts.

First I support the effort to bring more of a local presence in the broadcast services. We have recently seen our local public radio station lay off the last local on-air employee and now run the station lights-out from two states away. The two commercial stations are heavily automated much of the day with national programming. (They do still maintain a decent amount of local drive-time programming and some local sports to serve the community.) Only the college station is 100% live --it covers the needs of the younger audience. We are slowly losing the localism.

Having worked in commercial and non-com radio there are advantages and disadvantages to any regulation or policy. Finding the balance is difficult. Below are some of my comments on this effort.

ALL hour coverage is difficult and expensive, especially for smaller stations. The impact may be that only the larger group stations will be able to cover the staffing requirements while the mom & pops turn off at night. With today's automation and control systems the accuracy is high and service can be maintained with pre-recorded content. That is not to say this is preferred, but an economic consideration that needs addressed. Granting a waiver for small stations may be a way to help equalize the impact. (Say under \$250K/yr gross receipts = automatic waiver, others may petition.)

Disaster / Weather warnings are an important aspect of any broadcast service. Having worked under both the EBS and EAS systems the automation has greatly simplified and delivered more timely information. I would encourage the use of 'auto forward' on the EAS systems for all stations when a warning or other significant event is received. Having a duty officer for screening purposes may only delay delivery of timely information.

Representing the interests of ALL groups will be very difficult for a station to accommodate. We live in a diverse society and requiring all parties to have equal access to the microphone will be difficult to accomplish and may only drive audiences away from broadcast and toward subscription services. There are Right-wing

and Left-wing political viewpoints that are difficult to blend on one station. Additionally there are various religious organizations whose mission is to serve the community with their message, requiring the to have all (or no) faiths participate will potentially remove them from the dial. The nice thing about broadcasting is there is already great diversity in viewpoints. Some of the top rated syndicated programming is from a strong 'bias'.

Ownership limits should be imposed to cap large groups. From my observations the local stations are having a difficult time refusing the financial offers of larger groups. This is leading to a fewer having control of many more stations. Local broadcasting works when it is locally owned and controlled. There are economic issues that small stations struggle to address, but the solution isn't more consolidation. Lights out operations that are run hundreds or thousands of miles away are not serving the local community.

Voice tracking national programming isn't convincing to most users. 'Bob & Tom' are not in the local station, and most understand that. Having a limited amount of network programming with a 'pseudo local' presence is fine for continuity of programming, but not as a replacement for a local presence. Overnight programming / automation is and should continue to be used where economics of staffing a station are too difficult, but not for a replacement of on-air staffing.

I support having a local studio with local content. There should however be limited waivers available for smaller stations to remain on the air. If a main studio is air staffed during normal business hours, and automated overnight it still helps serve the community with local content. Full 100% network delivery and syndicated programming is a reality today and should be addressed. It may be possible to balance local origination and network programming with some level of program automation.

I endorse each station having announcements of how to contact them via a LOCAL number, and web site. Encouraging the public to stop-by for contests and the like is very successful! Encouraging the public to view the public file and make comments is a good way to

further a local responsiveness. Requiring a formal board or process may not work in all communities. The local news guy stopping by a city meeting is great for all involved. Having a community meeting on station policy may result in a hijacked agenda and not a true representative sample of the community effort. Listeners vote with the dial and it seems to work quite well.

Thank you,
Shane Godmere