04-233

From: Betty Hutchison [mailto:drbhutch@sbcglobal.net]
Sent: Tuesday, March 04, 2008 5:51 PM
To: Kevin Martin; Michael Copps; Jonathan Adelstein; Deborah Tate; Robert McDowell
Cc: Michelle Carey; Rick Chessen; Rudy Brioche; Amy Blankenship; Cristina Pauze; Jim Hirsch
Subject: Channel 7 ABC and the /community

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MAR 10 2008
Federal Communications Commission
Office of the Secretary

Dear Commissioners,

I understand the question has arisen concerning the service of ABC's Chicago outlet, Channel 7, to the C hicago Community. As an average consumer, I can say I have been impressed with the efforts of Channel 7 with food collectioin for the needyand cooperation with the Chicaago Food Depository and Dominic's Food Stores, with its multifaceted coverage of the various ethnic communities and their celebrations and commenorations of their ethnic heroes. Just yesterday, Channel 7 was the one channel I noticewd t hat featured commemoration of Casimer Pulaski, a treasufed Polish hero. I cvouod go on and on about the coverage Channel 7 gives to the Chiago community to put into perspective the richness and diversity of this city.

As a devoted patron of the Chicago Sinfonietta, a supporter and Board Member, I have appreciatewd t he continuing coverage Channel 7 has given to our organization. I cannot recount the times iI have heard friends and member of the Channel 7 listening community comment on having heard of the Sinfonietta because of the coverage received from the station.

Channewl 7 displays its anchoredness in Chicago and is very much a tresured resource for us and many other community grouops.

Yours truly,
Betty L. Hutchison, Ph. D.

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MAR 10 2008

Federal Communications Commission

Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233

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I submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233.

Many of the proposals in NPRM, contrary to the FCC's stated objectives, would harm both localism and diversity of viewpoints.

The true wellsprings of localism and diversity are smaller market radio stations and stations offering specialized programming (including religion, foreign language, ethnic and alternative programming). These types of stations also serve as important gateways for new entrants seeking business opportunities in broadcasting – increasing ownership among those traditionally underrepresented.

But just as major operating costs are quickly rising, and more Americans are turning to new media, the NPRM proposes measures that would substantially raise costs – something that will be keenly felt among small market and specialized programming broadcasters. The rational economic response will be service cutbacks or outright shutdowns. Neither outcome is in the public interest.

One of these ill-advised proposals would force radio stations to curtail reliance on labor-saving technology. An end to unstaffed operations will not improve responsiveness to a local community. To the contrary, it will likely lead stations to broadcast fewer hours or shut down altogether. Unattended operation with proper safeguards has helped small stations provide more service through efficiency. Take that away, and the Commission will create strong disincentive for stations to stay on during the late evening or early morning hours, hours during which very little revenue is generated. The increased operational costs will lead new entrepreneurs, including women and minorities, to look elsewhere to invest their savings and sweat equity.

The Commission must also reject proposal that would further limit where broadcasters can locate their main studios. The Commission acted in the public interest when it adopted rules many years ago to permit stations greater flexibility in selecting the location of their main studios, particularly in situations in which a broadcaster operates stations licensed to several nearby communities. If the Commission were to force each station to establish its main studio only in that station's community of license, the result would be that broadcasters – particularly small market and speciality programming broadcasters – would have to divert their limited financial resources from supporting and enhancing quality programming to covering additional and unnecessary real estate costs.

The FCC should also jettison proposals forcing stations to give away airtime to community groups. One proposal would even enforce public access requirements, similar to cable PEG channels. Cable has dozens, even hundreds of channels from which it can profit, but smaller market radio and stations serving small specialized audiences do not. Free is not really free to those who struggle every day just to keep the electricity flowing, the programming going, and the local news covered.

Smaller stations are keenly attuned to the communities they serve – it is how they remain in business. But the balance is delicate, and the Commission must not take action that will tip the balance so stations cut back on service or drop out. There is no 'public interest' in service that is both diminished and less diverse.

Respectfully submitted,

Signature

2/20/2008
Date

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