



Mt. Diablo Silverado Council • Boy Scouts of America

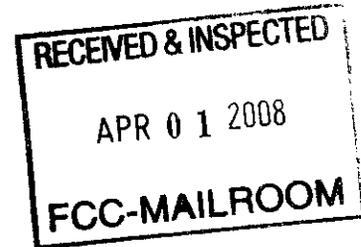
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March 24, 2008

Chairman Kevin Martin
Commissioner Michael Copps
Commissioner Jonathan Adelstein
Commissioner Deborah Tate
Commissioner Robert McDowell



Federal Communications Commission
445 12th Street, S.W.
Washington DC 20554

Re: *In the Matter of Broadcast Localism* (MB Docket No. 04-233)
Report on Broadcast Localism and Notice of Proposed Rulemaking

Dear Chairman Martin and Commissioners Copps, Adelstein, Tate, and McDowell:

I noted with great interest that the FCC recently issued a Notice of Proposed Rulemaking on broadcast localism. From what I understand, this proceeding is intended to "ensure that broadcasters are appropriately addressing the needs of their local communities." I wanted to be one of the first to tell you that, in my view and in the view of my organization, KGO-TV already serves our community in any number of ways that makes any additional federal regulation unnecessary.

1. We have worked with KGO-TV on a number of public service announcements which have significantly raised local awareness of the issues on which the Mt. Diablo Silverado Council, Boy Scouts America and the surrounding Boy Scout Council organizations have worked so hard. KGO-TV also has produced and aired several stories as part of their coverage of local and community news and events that have raised the profile on the issues on which our organization works. Each year the Bay Area boy Scout Councils have partnered with the local Food Banks for an annual food drive which has resulted in over one million pounds of food being collected each year for those in need. These positive outcomes have been achieved by the support of KGO-TV.

It is because of my first-hand experience with such a long-standing partnership that I am curious as to why the FCC deems it necessary to issue additional regulations. In my view, our community already is well-served by KGO-TV and no national regulation could create the kind of great local partnership that we already enjoy.

Sincerely,

Valerie J. Ridgers
Assistant Scout Executive

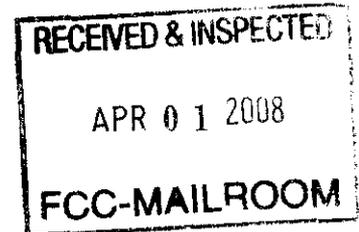
Cc: Michelle Carey, Rick Chessen
Rudy Brioche, Amy Blankenship
Cristina Pauze, Monica Desai

March of Dimes Foundation
Pennsylvania Chapter

Southeast Division
1319 West North Avenue
King of Prussia, PA 19306
Telephone: (610) 940-6050
Fax: (610) 945-6160
marchofdimes.com/pa/philadelphia

March 20, 2008

Chairman Kevin J. Martin
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554



Re: In the Matter of Broadcast Localism (MB Docket No. 04-233)

Dear Chairman Martin,

I am writing in support of Clear Channel Radio Philadelphia and to advise you of their active involvement and support of the March of Dimes Foundation. For the past ten years, Clear Channel Philadelphia which currently includes Power 99 FM, WDAS FM, Radio 104.5, My 106.1, Q102 and Rumba 1480 AM have been key partners in our efforts to raise awareness and educate the public about the causes and prevention of premature birth, birth defects and infant mortality.

During 2007, all six stations provided valuable airtime to promote a March of Dimes Prematurity Awareness Campaign for the month of November, as well as for our largest annual fundraiser March for Babies[®] (formerly known as WalkAmerica) during the months of March and April. In addition to PSA placements, the stations provided public affairs programming opportunities, produced targeted messaging for our school teams, and assigned on-air talent to host several pre-event kickoffs as well as the "day of program. They generously provided music vans at several checkpoints along the walk route and hosted a finish line celebration. All six stations contributed significantly to the overall success of the events in the Greater Philadelphia Area.

Clear Channel Radio Philadelphia has been an exemplary Corporate Citizen and has been instrumental in listeners with information and messaging that helps improve the health of babies and mothers everywhere. I strongly urge that your commission support their ability to continue this important service to the public. Thank you for your consideration.

Very truly,

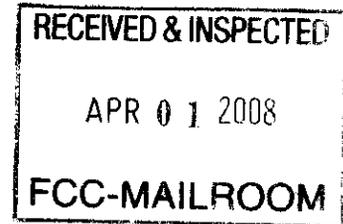
A handwritten signature in cursive script that reads "Jamila Patton".

Jamila Patton
Associate State Director of Communications
March of Dimes – Pennsylvania

march  of dimes

March 20, 2008

Ms Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554



RE: MB Docket No. 04-233

Dear Ms. Dortch:

Riverbend Communications licensee of radio stations KCVI, KLCE and KBLI, Blackfoot, Idaho, KFTZ, KTHK, and KBLY, Idaho Falls, Idaho, hereby files comments with respect to MB Docket Number 04-233 as follows:

- Community Advisory Boards
The FCC is proposing in its Notice of Proposed Rulemaking that radio stations organize local advisory boards with members representative of various community groups and organizations and that such advisory boards advise stations on issues of significant concern and interest to the station community of license.

Riverbend Communications believes these advisory boards are unnecessary and that their formation would largely duplicate efforts already in place to identify and serve community interests and needs.

The radio stations we own and operate in our communities of license participate regularly in a variety of community outreach endeavors including on-going local market research, local focus groups, local perceptual studies, and local music tests. This on-going research is part of the compelling need for our stations to remain competitive and relevant to their local communities. The result of our investment in local research enables us to properly identify local issues of importance to our local target audiences and help us create community service events, public awareness programs, public service announcements, and other news and information programs that respond to these identified needs and issues.

Additionally, managers and staff at Riverbend radio stations are personally involved in community outreach activities almost on a daily basis. Most of our key personnel serve on a variety of local boards and are members of local community service organizations and are well connected with a broad range of community leaders who work collaboratively with them toward solving local problems and contributing to local causes. We consider it a privilege to utilize our station resources for the common good and invite local groups to use the station as a major public awareness component for numerous community campaigns.

Annually, Riverbend radio stations are encouraged by our ownership to contribute to their communities at least as much value in estimated financial terms through community service and public affairs programs as the value they will generate in operating cash flow. We believe we can “do well” by “doing good”. The millions of dollars in value that our stations contribute to their local community causes and issues certainly evidence the effectiveness of our current efforts to be responsible community partners.

The proposal by the FCC to require the formation of “local advisory boards” in our opinion is counter intuitive to our current initiatives and would, we believe, create bureaucracy, reduce efficiency, dilute resources, and send a message that stations could “defer” to advisory boards the process of identifying local needs, rather than fulfilling their licensed mandate to take responsibility for this critical imperative. We do not believe the identification of critical local issues should be delegated to anyone outside responsible parties at licensed radio stations. The requirement to form community advisory boards would, in a de-facto sense, suggest that others, not primarily station personnel, should be responsible for making these key determinations.

- Remote station operations

The FCC is proposing that all stations be “manned” during all hours of operation.

Riverbend stations are currently “manned” during business hours and at most other times, with the exception of occasional overnight periods and on holidays when stations utilize automatic monitoring technology to regulate programming and technical operations.

It is our opinion that requiring each individual station to be manned 24 hours per day, 7 days per week, regardless of holidays, overnights, or combo and cluster situations would impose financial constraints upon licensees that could adversely affect a stations ability to provide responsible community service during most hours of a stations operating schedule. Currently, stations are able to utilize some economies of scale to invest in more prime time community service programming. The quality of such community service programming could decline in the event stations were required to use more of their resources to fully staff during non-prime hours or to duplicate expenses for stations in a combo or cluster structure.

▪ Quantitative Programming Guidelines

The FCC proposes to regulate or impose specific guidelines on the amount of news, public affairs, public service, and other programming that radio stations broadcast during their weekly schedule.

We believe this proposal is a step backward and does not take into consideration the changing media marketplace of today.

The current FCC proposal seems to roll-back the clock to a time several years ago when the FCC imposed such requirements. At that time, however, the number of different media voices in a typical community were far fewer than exist today. With the rise of new media, and the proliferation of media choices in almost every market, the percentage of total air time allocated to news, public affairs, public service, and other programs is driven largely by competition between media, their divergent target audiences and the economics of the market.

While Riverbend believes that it is essential for radio stations to broadcast news, public affairs, public service, and other programs to remain a viable and responsible community partner, we affirm that the amount or percentage of a stations total broadcast time dedicated to each of these segments should remain at the discretion of the licensee and should be based upon the overall operating strategy of the radio station including its format, target audience, and the market in which the station operates. To demand that radio stations schedule a fixed percentage of its programming to delivering news, public affairs, public service or other programs does not recognize the reality of today's media landscape and the variety of programs and program types available on all types of media. Local radio stations should not be disadvantaged in any way by a government mandate to alter or modify its programming mix when other media, most notably, unregulated new digital media outlets are able to compete for market share and revenue share without any government imposed programming percentage guidelines.

- Main Studio

The FCC, in this notice of proposed rule making would require that radio stations maintain offices and studios in their licensed communities and operate full time from these facilities.

We reject this proposal as being economically adverse to local radio stations.

Riverbend Communication's radio stations are operated consistent with FCC guidelines including maintaining offices and studios within appropriate signal contours of the licensed communities. We object however, to any change in the current requirements which could require radio stations to operate exclusively from offices and studios only within licensed communities. This would create severe economic distress to licensees who have operated several of their "suburban" stations at a central facility, while these "suburban" stations are actually licensed to communities adjacent or contiguous to the primary population center. This affords licensee's an opportunity to leverage economies of scale and sustain operations that could not be sustained, if each station were required to operate full time as a separate and stand alone facility.

Most of us applied for licenses with a good understanding of the current main studio rules. We feel that it would be very unfair to change or reverse the conditions upon which these applications were made, financing arranged, and licenses obtained. This proposed rule would change the entire business model for most, if not all, radio broadcasters.

Because of the proliferation of new audio distribution channels via satellite, internet, cell phone, ipod, etc, local radio stations have seen erosion in audiences and the consequent decreases in local ad revenues. Any FCC rule requiring stations to incur more expense such as this rule proposes, suggests that the FCC is unaware of the current declining economic climate that most small market radio broadcasters face.

Radio stations, who maintain their currently required offices and studios in, near, or adjacent to their licensed communities, continue to operate in the public interest and should not be penalized by this proposed rule change. Requiring a change of this magnitude could eliminate many smaller broadcasters from obtaining radio station licenses in the future and would adversely affect radio station licensees who are presently struggling to find ways to sustain operations.

We petition the FCC to not impose this rule which would make radio station ownership economically prohibitive for many current and future broadcasters.

- Voice Tracking

The FCC is proposing that radio stations disclose that announcers on their radio stations may have pre-recorded their programs and/or that the programs originate from outside the licensed community.

Riverbend Communications proposes that the FCC reconsider this issue. The FCC may propose that licensee's regularly broadcast a disclaimer such as "portions of the foregoing have been pre-recorded", or something similar. We point out, however, that music content is pre-recorded most often outside the market, that commercials are most often recorded outside the market, news and network broadcasts are most often imported from outside the local market. To require that announcers who appear on local stations disclose that they have pre-recorded their content from outside the market really serves no purpose any more than requiring television programmers, or filmmakers to disclose that their content originated at a location outside the market. This proposal appears to discriminate against radio broadcasters since internet and satellite broadcasters have no such requirement.

- Local Music

The FCC is asking local broadcasters about a potential rule requiring local radio stations to disclose how they select their play lists and how much local music is being played.

Riverbend rejects this proposal as being competitively unfair. The music on the Riverbend stations is selected through auditorium music testing and call out research. Requirements of radio station programmers to report how they select their music content proposes that the government regulate programming formats. This, we believe, is an affront to free speech. The processes used to select music programming for radio stations could be considered proprietary for competitive reasons and any government regulation that radio stations disclose their process is, in our opinion an unwarranted intrusion into free enterprise. Several on air monitoring services now exist that capture over the air music play lists after they are broadcast. Radio stations routinely subscribe to these services to compare their play lists to those on other stations with similar formats. If the FCC wishes to audit the number of songs being played over the air on particular stations, they can obtain this information through these same monitoring services.

We believe requiring radio stations to regularly report songs they play or to disclose proprietary formulas for selecting music or requiring a local music quota is overreaching and an inappropriate regulatory function of the FCC.

Ms. Marlene Dortch, Secretary
Federal Communications Commission
March 20, 2018

We hope the Federal Communications Commission will seriously consider our response to the issues associated with the Notice of Proposed Rulemaking MB Docket 04-233 and that our views will be weighed carefully before any further action is taken or made final with respect to these proposals.

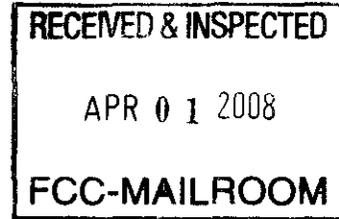
Sincerely,



James T. Burgoyne
President
Riverbend Communications



590 W. Maple Street
Kalamazoo, MI 49008
Phone: (269) 388-3333
Fax: (269) 388-8322



March 22, 2008

Re: Comment in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233

To Whom It May Concern:

WWMT-TV, and our digital station the CW7, serve the diverse communities of Western Michigan. It is a huge geographic area. Our market is some 140 miles from North to South along the Eastern Shore of Lake Michigan and extends some 90 miles inland.

We have made a concerted effort to hire individuals from all portions of our area so that we can understand the issues affecting our region and how we can address issues of concern in our local news coverage and our community service efforts.

Last March, we added one hour of additional news coverage from 5am-6am to better serve our area. On our digital CW affiliate, we also started a 10pm newscast that runs a half hour seven days a week in January of this year.

Also last year, we were able to purchase a second satellite truck to better cover the Northern half of our service area. This truck is based in Holland, Michigan and a reporter and photographer also live nearby to provide a faster response to breaking news and more insight to our daily story mix.

Ours is a very competitive news market. In reviewing the report on "Broadcast Localism", we believe that competition provides the real incentive to cover issues of local concern in our area. Four stations actively pursuing stories of interest and importance does more than any mandate could to insure that the needs of our service area are well covered.

Having worked in the era of community ascertainment, I believe that we are much more connected today to the needs of our service areas than when we were required to have community advisor panels and forced ascertainment.

“Broadcast Localism” 2

Any re-imposition of rules will force us to redirect vital station resources. This redirection may hurt rather than help our efforts to cover issues of importance to our service area.

Please allow us to continue to serve our local communities without being burdened by more rules and regulations.

Sincerely,



H. James Lutton
Vice President & General Manager



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Received & Indexed

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FCC Mail Room

March 18, 2008

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: MB docket number 04-233

Dear Committee Member:

I am submitting comments in Response to Report on Broadcast Localism and Notice of Proposed Rulemaking – MB docket number 04-233.

I am involved in running a small market non-commercial FM station. With regards to the issue of a community board from widely diverse backgrounds, I believe this would bring about a great deal of confusion and difficulty in selecting programming for the station. It would be nearly impossible to select programs that would meet everybody's ideas on that committee. This could cause some real divisions within the committee; and it is possible that some committee members would vote against filing for license renewal if they didn't get their own personal agenda approved.

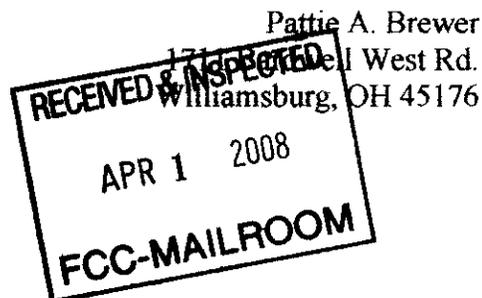
There is also the issue of disallowing unattended operation. If this were implemented, smaller stations like ours would have to shut down at night and overnight until the morning staff comes in. At the present, we have equipment that takes care of that which we control by phone. This equipment makes it financially viable to broadcast in this area. It would adversely affect us and I'm sure many other stations like us to be required to staff our radio station 24 hours a day, seven days a week. Unattended operation of a radio station is essential so that financial resources are used to provide local radio programming.

Sincerely,

A handwritten signature in black ink that reads 'Mark Taylor'.

Mark Taylor
KNEO General Manager
Sky High Broadcasting President

The Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
Attn: Chief, Media Bureau



To whom it may Concern,

I am writing in regards to the FCC Docket #04-233, and on behalf of my friend, Carol Davidson. Carol is an adult that has had disabilities since birth, as well as some other health problems.

One thing that Carol has always gotten much joy from is listening to radio music. It is her life. This summer she will have listened to WJJO, 1160 Oldies from Cincinnati, for 40 years. She has grown quite attached to the announcers, as well as the music. In fact, she likes to keep in touch with those working at the station.

Carol lived in Ohio for her entire life, up until 1.5 years ago. Her life was turned upside down since the passing of her parents, whom she lived with. Both died of cancer within two years of each other. She then had to leave the home she grew up in, her neighbors, friends, church family, all that she was familiar with, and move in with her Aunt in Indiana. So many losses in such a short time would be difficult on anyone, but Carol's disabilities make them even more tragic. To make matters worse, she couldn't get her beloved station in on the radio because it was too far away. She was really discouraged. She had kept in touch with her radio friends by mail and email, and shared her heartache of not getting to listen to them anymore. They suggested she try listening to them though the internet. She was overcome with joy, being re-connected with something and someone so familiar to her. She says being able to listen to that station has been a lifeline to her of things back home, things she grew up with, people she loved. Her faith, family, and radio station has helped her tremendously to overcome her losses. The radio, more than anything, has given her something to look forward to each day. This is especially important for someone like Carol.

She now feels listening to her station from back home is being threatened by the FCC, through this Docket #04-233. These proposals are coming at a time when operational costs are quickly increasing, and the added expensive that the FCC is considering could very well force the smaller stations to cut back or have to shut down completely. This would be devastating for Carol and others like her, who depend so much on music. Not to mention, the devastation it would also cause the people at the radio station.

I'm asking you, for people like Carol, which use this station or others like it, as a means to brighten their day. She loves this station, and its people, and the only way she can hear it is by means of the internet. Please realize the importance of dropping these expensive government mandates you are considering before the damage is irreparable.

Carol and I thank you very much for your time, and consideration on this matter.

Sincerely,



Pattie A. Brewer