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APR 8 - 2008

FCC Mail Room

2008 APR -9 P 2: 00

April 7, 2008

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

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

Dear Chairman Martin:

I am writing you today regarding the recent news that the Federal Communications Commission is considering a radical re-regulation of our nation's broadcast system in their pending localism proceeding. It is my understanding that the Commission intends to reverse decades of deregulatory progress by imposing a series of new and burdensome regulations on broadcasters.

Clear Channel Radio-Madison reaches nearly a half million people in the Southern Wisconsin on WIBA FM 'Classic Rock', WZEE FM 'Z104', WXXM FM 'The Mic 92.1', WMAD FM '96.3 Star Country', WIBA AM "News Talk 1310" and WTSO AM 'ESPN Radio 1070". We use every resource at our disposal including data base contact with listeners, access to community and civic leaders and our direct connections with city leaders and heads of the vital local community organizations, to assure that we are current on the needs of our communities.

In 2007, we helped dozens of local charities and organizations and including The Boys & Girls Club of Dane County, The Salvation Army, The American Family Children's Hospital, The Paul P. Carbone Cancer Center, The Dane County Food Pantries and The Madison Aids Network raise funds and awareness in our community. Donating over \$400,000 in air time for public service announcements and special programming and raising over \$1.3 million dollars for these organizations.

We provide special targeted programming to serve the public interest including Outreach with host Derrell Connor on WIBA AM. The purpose of Outreach is to raise awareness and to educate listeners on the positive things that people, most notably people of color, are doing in the Greater Madison area every single day. People who are working every day to provide programs and activities designed to educate youth, services that promote workforce and economic development or even just to make the community a better place. Derrell is the Chairman of the Board of Directors for the Urban League of Greater Madison, and has actively been involved with Big Brothers/Big Sisters for the past ten years. We provide weekly programming for our Hispanic Community on WXX FM called La Original. Our News Team working in conjunction with Programming and myself meet quarterly to make sure we continue to do the activities that are needed for ascertainment of the kinds of issues and concerns our communities want and need.

As broadcasters we recognize the important role we play in our communities and we work hard everyday to build upon the foundation we have built over many years. The key managers, programmers and leaders in our stations combine for over 133 years of experience in the Madison market place. I personally have been with these stations since 1981.

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In light of increasing market pressures, new localism rules are unnecessary. If the new rules are adopted, they will represent a significant reversal of FCC precedent. In the early 1980s, before broadcasters faced serious competition from cable, satellite and the Internet, the FCC determined that heavy localism requirements were an unnecessary regulatory burden. Market pressures, both from within the broadcasting industry and from other media, ensure that broadcasters will remain dedicated to local programming, a fact that is truer today than ever. Without local programming, broadcasters will not survive. The FCC should consider the impact of these market pressures before imposing new onerous localism rules.

Formal ascertainment requirements are a proven failure. When the Commission deregulated radio in 1981, it recognized that formal ascertainment requirements are not meant to be "an end unto themselves." The Commission noted that the breadth of radio service generally means that the goal of well-balanced programming should not be forced on stations individually. It eliminated formal ascertainment requirements completely, calling the rules a regulatory "straight-jacket" that crammed every station into the same mold. The same logic holds true today. Creating and maintaining these community boards would be a bureaucratic nightmare – especially considering that broadcasters would have no legal authority to coerce community members to participate. The "community board" requirement is a superficial solution in search of a problem, providing no discernable benefit while burdening a broadcasting industry besieged by competition that does not share the same requirements.

I urge you to support us and for the Federal Communications Commission not to impose any rules that create unnecessary burdens and impinge on our ability to continue providing valuable community service.

Sincerely,



Jeff Tyler
Vice President & Market Manager
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