

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

To: The Federal Communications Commission; Washington, D.C. 20554

From: Robert H. Pettitt, Licensee & General Manager KRHP-LP Ch. 14; The Dalles, OR

We are requesting a reconsideration, or tabling of, or otherwise not enacting the Commission's decision to apply the enhanced disclosures and requirements for Class A Television Stations as expressed in the Commission's Report and Order of November, 2007; and released on January 24, 2008.

In the alternative, we would request the Commission to specifically grant a waiver of these Rules for Enhanced TV Disclosures and Requirements to KRHP-LP Channel 14 in The Dalles, OR (Facility ID #56971); and to other small market and financially limited Class A Television Stations.

KRHP-LP Channel 14 in The Dalles, OR is the only over the air local broadcast television station located in the area of The Dalles. We provide niche community television here to the beautiful Mid Columbia River Gorge area; located about 85 miles East of Portland, OR. Although The Dalles is considered to be in the Portland, OR DMA, none of the Portland TV stations reach the community directly because of the geographic terrain. Translators of six of the Portland stations do, however, serve The Dalles.

KRHP-LP broadcasts twenty four hours a day with a clean, wholesome, family values & religious programming format. It broadcasts over 20 hours a week of locally produced programming. In the latest filing quarter (Winter, 2008), KRHP-LP broadcast an average of 22.3 hours of clean, wholesome family values Core Children's Programming per week.

KRHP-LP is able to bring weekly local Church Services to shut-ins and others unable to get to Church. We do a weekly local program with local Doctors and Hospital Personnel talking about various health issues that can be community specific. Then, viewers can actually be seen professionally by some of these same Physicians and other health professionals. We have a weekly money management and budgeting program featuring a local banker, a local Pastor, and the manager of a local government housing agency. Viewers are then able to seek counseling from the very same individuals that they have seen on our local television station.

In light of the awful proliferation of appalling television for young people, we offer well over 20 hours a week of Family Friendly Children's Educational programming. One Mother called us to tell me that she and her toddler have a date with channel 14 TV every weekday morning (Monday through

Thursday) at 10:00 AM for “Super Book” and “Flying House”. A Grandparent wrote in to say that she video taped our Children’s Programming to send to her Grandchildren because they did not have it in their city. In fact, the last time I looked at the FCC 398 Reports on file for TV stations in the Pacific Northwest, we had far more Core Programming then anyone.

We accomplish all this on a shoestring of a budget. In the calendar year of 2007, the total income including advertising & programming revenues; and giving was under \$54,200. Our total expenses were under \$37,100; and we were still able to put away nearly \$18,000 into our digital transition savings fund.

KRHP-LP has no paid employees. We all are volunteers with other, outside sources of income. If we had paid employees, we would not be able to stay on the air and do what we are able to do for the community.

From a very practical point of view, some of the new Class A standards would be quite devastating for KRHP-LP in The Dalles, OR.

The taping, the viewing, the filing, the computations, and the record keeping that would be required to have the information with which just to complete Form 355 would be just tremendous. The additional requirements and paperwork would be most burdensome for small market, financially strapped stations like ours. KRHP-LP would have to hire someone just to do nothing but these additional requirements, because you just can’t get volunteers to even do that kind of grunt work.

Although we do not presently have a website, these requirements would preclude us from ever even establishing a website. By the Commission’s own estimates, just the initialization of an average Public Inspection File would run \$15,000. We simply do not have that kind of money; and we have no access to that kind of money. And that does not even take into consideration the on-going maintenance costs. So, KRHP-LP would not be able to ever develop a website at anytime in the future.

KRHP-LP would be unable to afford to produce any kind of local news coverage. We simply do not have this kind of funding available; and the prices that we can get for advertising absolutely can not generate anywhere near those kinds of funds. Because we can not afford to produce local news programs, the absence of these types of programming on our Form 355 could make us look deficient in the eyes of some who read them.

As to keeping track of public service advertising; we would have another very costly dilemma. While we provide many dollars worth of free PSA advertising to promote many different local groups and happenings, we again, would have to tape and view the entire day’s schedule to time and catalogue

every public service advertisement that comes off every program, every day. We have no mechanism to keep track of how many times a particular ad happens to play on a local basis; and that certainly applies also to the national networks we use.

Taking these requirements in connection with additional ones the Commission has proposed are simply too costly to allow us to continue. Manned studios are another prime example of this: Having the studios manned twenty fours a day and seven days a week would mean that the costs would be absolutely prohibitive. First of all, the station is set up to be automated. Our E.A.S. System is fully automated for all adverse weather events, and other national, state, and local emergencies. The costs of hiring people to sit in the station who would only call me anyway if there was a problem, is a colossal waste of money, benefits, and insurance etc. This would either result in us having to severely limit the number of hours we are broadcasting, or it would severely curtail funds that could be available for improved local programming (if funds were even available for this which is highly unlikely in our case).

To sum it all up, KRHP-LP TV-14 provides a real public service. It is the kind of Public Service envisioned when Low Power Community Television was established. KRHP-LP does this with an amazingly low budget. However, if these overly burdensome regulations were to be implemented; KRHP-LP would be unable to survive. And it would be the over the air viewers in The Dalles, OR and Dallesport, WA; and the cable viewers of these communities as well as Dufur, Roweena, and Hood River in Oregon and Bingen, White Salmon, Murdoch, and Klickitat in Washington that would suffer.

Please let me recast our requests:

We are requesting a reconsideration or tabling of, or otherwise not enacting the Commission's decision to apply the enhanced disclosures and requirements for Class A Television Stations as expressed in the Commission's Report and Order of November, 2007; and released on January 24, 2008. It is our belief that there are many other Class A Television Stations that will find these enhanced disclosures and requirements extremely burdensome as we have found.

In the alternative, we would request the Commission to specifically grant a waiver of these Rules for Enhanced TV Disclosures and Requirements to KRHP-LP Channel 14 in The Dalles, OR (Facility ID #56971); and to other small market and financially limited Class A Television Stations.

We further request that these rules be stayed as to KRHP-LP Channel 14 in The Dalles, OR pending the Commission's decision on this request.

Absent a reconsideration, tabling, or other type of inactivation of the order; or absent a waiver of the new rules for KRHP-LP Channel 14 in The Dalles, OR; (Facility ID #56971); we will have to relinquish

Class A Status for KRHP-LP.

Thank you so very much.

Respectfully Submitted,

Robert H. Pettitt
Licensee