

THE PAUL BUNYAN NETWORK
MIDWESTERN BROADCASTING COMPANY

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Ross Biederman, President

April 4, 2008

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

RECEIVED & INSPECTED

APR 14 2008

FCC-MAILROOM

Re: MB docket # 04-233

Comments in Response to Report on Broadcast Localism and Notice of Proposed Rulemaking

Dear Secretary:

I appreciate the opportunity to submit to you my comments on the Commission's NPRM. My comments reflect, without exception, the financial hardship these changes would have on all ten (10) or our Northern Michigan AM & FM stations, as well as the impact these changes would have on our ability to continue to provide the 24-hour service to the communities we serve.

The FCC aims to heighten localism by prohibiting the unattended operation of a radio station. In our case, the opposite will actually occur because we will be forced to cease broadcasting overnights, leaving behind communities that currently enjoy our late night programming with "dead air". It's worth noting that our stations are outfitted with impressive technologies that enable us to broadcast unmanned with all the "peace of mind" that we get during manned operations. Should there be a need to broadcast an emergency alert, our EAS systems are capable of such broadcasts to the listeners and to the secondary radio stations that are linked to us. An hourly overnight employee cannot be equipped nearly as well as the technology we currently utilize.

The FCC has before it a proposal to mandate that stations locate main studios in the Cities of License. Such a requirement would not only be costly to the Company, but would become terribly inconvenient to our current employees, not to mention the additional transportation costs to the employees. Even if we are "grandfathered in" to maintain our main studios where they currently are, such a mandate would devalue our properties and their salability, as a prospective owner could not assume our studios.

All these proposed mandates before the FCC would require such an undue and ill-timed outlay of capital that we would have to sacrifice employees, health care and retirement benefits, and especially our ability to serve our Communities in the manner to which they've become accustomed. I appreciate your consideration of my comments.

Respectfully,



Chris Warren
Corporate Controller

