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April 21, 2008

To: FCC Commissioners
From: Michael Petersen, President, Crossroads Communications
Re: Proposed changes in localism rulings for radio stations

Dear Commissioners:

Our company takes pride in providing local service to our cities of license and to the entire metro area as a whole. We do this from one centralized location in downtown Terre Haute. Two of our stations, WBOW AM and WBOW FM are indeed licensed to Terre Haute. However we have two stations licensed to a small community 15 miles east of Terre Haute. They are WSDM-FM and WSDX AM in Brazil, IN. We also have WAXI FM licensed to Rockville, a very small community 25 miles north of Terre Haute.

Regarding the reinstatement of the main studio rule to be physically located in a station's community of license: If we had to separate our studios and offices, having three separate facilities instead of one, it would greatly increase our overhead expenses, and actually reduced our ability to provide local services. We do offer toll-free telephone service to our studios and offices, and we have personnel who live in our communities of license and are active in organizations that serve those communities.

In addition to broadcasting local sporting events, we also provide live coverage from county fairs, festivals, and events. We recently moderated a political candidate forum in Brazil, IN and pod cast the entire event on our web site.

Please don't hamper our efforts to provide local service to our listeners by imposing unnecessary burdensome requirements on where our studios should be located.

Regarding eliminating unattended operation of broadcast stations (reinstatement of the old rule): Our technology allows us to provide excellent service, even when no one is actually at the studio. In the event of a weather alert or warning, an Amber alert, or a national EAS message, our equipment will interrupt program on all stations to broadcast the message(s). Our programming manager can also be alerted via his cell phone, and could be on the premises within 10 minutes. We can also access our station studio system via a secured internet connection so they can be operated from a remote computer. So far, this has never been necessary. Our Rockville station is also equipped with an emergency studio and a propane-powered generator, so that in the event of a catastrophic failure of the power grid, that station would remain on the air.

While we do in fact have personnel at our studio most of the time, we do operate unattended during overnight hours. If someone were there, they probably could not perform any better than with the systems we currently have in place, and the economics would not warrant they're being there.

Regarding established minimum programming requirements for processing license renewal: We currently air PSAs and programming to address community needs, in addition to interviewing the "movers and shakers" in our communities during regular programming segments. This is documented in our Issues Programming lists in our public file. I'm not sure what the Commission has in mind in this area, but

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providing additional documentation would require additional hours from someone, and this is probably documentation that no one would ever look at anyway. What purpose would it serve?

Regarding mandating permanent community advisory boards: Advisory boards are a good idea for any business, and we do in fact have such a board. But mandating this would require the filing of documentation that is economically burdensome and unnecessary.

Regarding network affiliation contracts and disclosure of National Play lists: I am not sure what the thinking is here, but our affiliations contracts are already in our public file. Disclosure of play lists would be anti competitive. That's *our* business.

Almost all broadcasters are challenged economically at this time and placing additional documentation regulations on us would not help the cause of localism; it would harm it. There are only so many dollars available, and if we have to channel money that is now going to pay for people doing the programming to people doing paper-work tasks or what I call "baby sitting" tasks, then we would have to reduce expenses in other area.

If you would like me to provide amplification on any of the above topics, feel free to contact me.

Sincerely,

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