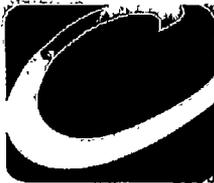


04-233



APR 14 P 2: 25

# CLEAR CHANNEL RADIO

4000 #1 Radio Drive, Louisville, Kentucky 40218 Phone (502) 479-2222 Fax (502) 479-2308

**Bill Gentry**  
**Regional Vice-President**  
**BillGentry@ClearChannel.com**

April 10, 2008

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

Dear Chairman Martin,

It is my understanding that the FCC is considering a radical re-regulation of our nation's broadcast system in the pending localism proceeding. I am writing to ask you to reconsider these actions, as new regulations on broadcasters are an unnecessary imposition.

Clear Channel Radio in Louisville, Kentucky reaches nearly half of all listeners in our eight-county metro area. The Clear Channel brands represent, inform, and are deeply involved in the local community, as well as many charitable activities. For example:

**WHAS**

**WHAS Crusade for Children – Raises \$5 million a year for special needs children in Kentucky and Indiana;**

**Susan G. Komen Foundation – Race for the Cure, Pink Tie Ball, and additional events to help fight breast cancer;**

**Kentucky Humane Society – Pet of the Week providing pet adoption updates, interviews, and remote broadcasts.**

**WAMZ**

**St. Jude Children's Research Hospital – Raises \$330,000 or more per year via Radiothon, WAMZ St. Jude Country, WAMZ Softball Team, and Give Childhood Cancer the Boot at the Kentucky State Fair;**

**Alzheimer's Association Walk;**

**American Lung Association Asthma Walk.**

**WOME**

**Kentucky Harvest – Quarterly food-raising events, Blessings in a Backpack;**

**Susan G. Komen Foundation – Race for the Cure, Pink Tie Ball, and additional events to help fight breast cancer;**

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**Operation Homefront** – Provides needed personal care items for active-duty military personnel overseas.

**WKRD**

Toys for Tots – Several shows have live broadcasts around town each year to collect toys at Christmas for underprivileged children;

Epilepsy Foundation – Tony Vanetti and Adam Neft host an annual event to benefit the Epilepsy Foundation;

Special Olympics – Tony Vanetti hosts an annual auction to raise money for the Special Olympics.

**WLUE**

American Heart Association – Heart Walk, Start Campaign, and regular public service announcements;

FEAT – Families for Effective Autism Treatment – Create a Stir for Autism Banquet, Dance with the Louisville Stars, golf scramble and walk/run events and recreational programs;

Girl Scouts of America – Walk/run event.

**WTFX**

Kentucky Harvest – Quarterly food-raising events, Blessings in a Backpack;

Cystic Fibrosis Foundation – Run Like Hell 5 – K run with participants running in costume;

Toys for Tots – Several shows have live broadcasts around town each year to collect toys at Christmas for underprivileged children;

**WZKF**

University of Louisville Dance Marathon – Benefits Kosair Children's Charities;

St. Baldrick's Day for Childhood Cancer Research – Raised over \$200,000;

Brightside Volleyball Tournament – Brightside is a City of Louisville partnership which funds clean and green activities to beautify the city and foster community pride.

Clearly, Clear Channel plays a vital role in our community and we take this service very seriously. I hope that you and the Commission recognize that additional burdens on broadcasters will only potentially disrupt or reduce the services we provide our listeners and your taxpayers.

Thank you for your time and consideration.

Sincerely,



William R. Gentry, IV  
Regional Vice-President



2008 APR 14 P 2: 25

April 8, 2008

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

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

Dear Chairman Martin,

I am writing to you today regarding the radical re-regulation of the nation's broadcast system that the Federal Communications Commission is currently considering in the pending localism proceeding. I find this disconcerting and urge the Commission to reconsider such actions. As the President and Market Manger for Clear Channel Chicago, I can assure you that our seven stations – WGCI-FM, WGRB-AM, WKSC-FM, WLIT-FM, WNUA-FM, WVAZ-FM, and WVON-AM, go above and beyond what is mandated to serve the local community.

For example in 2006, Clear Channel Chicago partnered with WVON-AM, a Chicago institution and pillar of the African American community, to expand the service it offered to the Chicago community. The partnership allowed WVON to reach many more listeners with a new 10,000 watt signal and the ability to broadcast 24 hours a day from its new location at the formally oldies formatted Clear Channel station 1690-AM on the radio dial.

In 2006, Clear Channel Chicago's WKSC-FM's HD2 channel was one of the first HD2 channels to begin airing Pride Radio, programming for the gay and lesbian community, created by gay and lesbian development staff. In addition, for the past 15 years WGCI-FM has hosted a workshop with informative sessions on such topics as acting, gospel and inspiration, Hip-Hop and R&B. In addition, twenty five aspiring singers and rappers, chosen from random, are given the chance to perform and receive feedback from a panel of music executives.

In 2007 alone, Clear Channel Chicago also donated over 40,000 PSAs to over 250 local non-profit and community service organizations such as Rainbow PUSH Coalition, the Chicago Department of Health, the Chicago Urban League, the American Cancer Society, the National Kidney Foundation, United Negro College Fund and the Illinois Hispanic Chamber of Commerce, with an airtime value of over \$15,000,000.

These are just several of the ways in which Clear Channel Chicago demonstrates our commitment to the local community and its charitable organizations. This commitment to our community is definitely in the public's best interest. As you move forward in the localism proceeding, we ask that you recognize that free radio is committed to serving the needs of our local communities and should not be shackled with additional unnecessary mandates. To do so would be toxic to the future of free radio and the public service broadcasters already provide to their local communities.

I appreciate you taking our views into consideration during the ongoing proceeding, and we look forward to hearing from you soon.

Sincerely,

Earl Jones  
President and Market Manager  
Clear Channel Chicago

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Freedom Broadcasting  
of New York, Inc.  
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Schenectady, NY 12309  
P • 518.346.6666

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2008 APR 14 P 2: 26

April 7, 2008

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

The Honorable Kevin J. Martin  
Chairman  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Dear Chairman Martin:

WRGB-CBS6 takes very seriously its responsibility to serve the local interests of the Albany-Schenectady-Troy DMA covering upstate New York, and portions of Southern Vermont and Western Massachusetts. The views, interests and concerns of this region are foremost with our staff when making decisions about local programs and local news coverage. In addition to 36 hours of local news per week, WRGB is the community service leader in two key areas: bringing critical problems affecting viewers to light through debates and public forums, and being a viewer advocate.

The report on "Broadcast Localism" rightfully points out the need for stations to be engaged in the community and to be responsive in meeting those needs whether the constituency is large or small. WRGB-CBS6 is engaged and responsive. Allow me to give some examples:

**CBS 6 "Melodies of Christmas"**

In 1980, WRGB produced its first annual holiday extravaganza to benefit the newly-formed Child Cancer Program at Albany Medical Center. Since its inception, more than \$5 million dollars have been raised by WRGB's "Melodies of Christmas," which has grown into the region's premiere holiday show. The shows and telecast not only raise money for the fight against childhood cancer, but also highlight the Empire State Youth Chorale and Empire State Youth Orchestra.

**Political Debates and Focus on Issues**

WRGB-CBS 6 remains a leader on the local front in bringing attention and focus on important issues to Capital Region viewers.

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- In 1998, WRGB was the broadcaster that brought the candidates of a highly-contested New York Senate race together. The Schumer/D'Amato debate was held in WRGB studios, moderated by WRGB Anchor Liz Bishop and covered by statewide media. The debate was televised live across the state.
- In 2001, WRGB brought together health care providers, administrators and legislators for a public forum for a comprehensive look and discussion of the challenges facing health care in Upstate New York. The forum was broadcast by WRGB.
- In 2004, WRGB brought candidates together, this time a politically-charged debate between Albany County District Attorney Paul Cline and his challenger David Soares. WRGB was the only local news entity to bring the issues in long-form to area viewers and voters. The debate was broadcast by WRGB.

### **Regional Hospital Benefits**

WRGB has been a driving force behind benefits for local hospitals, most notably the Ellis Hospital Skins game and the CBS 6 Invitational for Saratoga Hospital Foundation. Both events grew and flourished as a result of WRGB's stewardship. From 1993 through 2007, the Ellis Hospital Skins Game raised more than \$2 million; and since 2002, the CBS 6 Invitational raised nearly \$500,000 for Saratoga Hospital in Saratoga Springs, New York

### **CBS 6 Blood Drives**

From 1987 through 2007, WRGB partnered with the Red Cross to conduct multi-location, semi-annual blood drives. In that time, nearly 18,000 units of blood were collected to benefit those in need in New York's Capital Region.

### **Viewer-Advocacy**

In 2007, after investigating NYS cyber predator laws, WRGB revealed that a loophole in NYS law makes prosecuting adults who prey on children over the internet nearly impossible. In a follow up to that investigation, WRGB convened a public forum and a panel of law enforcement officers, prosecutors and legislators to discuss the problem. Armed with hundreds of signed petitions from viewers, the panel agreed to form a special committee to pass legislation in 2008.

### **News Coverage**

WRGB broadcasts 36 hours of local news coverage throughout the broadcast week. This is more than 21% of our weekly broadcasting hours. These daily broadcasts include local news, weather and weather emergencies, crime, investigative and consumer advocacy issues, and segments regarding politics, business issues, family matters, health reports, human interest stories, local sports, and community events.

The above examples of our charge to serve local interests of the Capital Region of New York are just small examples of our commitment to our responsibilities as a broadcaster. We are proud of our efforts, and fear burdensome rules that dictate how and what we cover will not only keep us from performing our mission properly but will also cause us to redirect limited station resources to fulfilling rules imposed upon us. We understand that the successful broadcaster is the one that best serves his/her community. Management and ownership recognize this truth and work hard each day to become their community station. Please allow us to continue serving our constituents without further rules and regulations related to how we do our jobs.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read 'R. J. Furlong', with a large, sweeping flourish extending to the right.

Robert J. Furlong  
Vice President & General Manager



# CLEAR CHANNEL RADIO

KSSK - 590 AM / 92.3 FM  
KIKI - HOT 93.9 FM  
KUCD - STAR 101.9 FM  
KDNN - ISLAND 98.5 FM  
KHVH - 830 AM  
KHBZ - 990 AM

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April 14 2008 APR 14 P 2: 29

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

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

Dear Chairman Martin:

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

Clear Channel Radio Hawaii reaches nearly six hundred thousand listeners through the State of Hawaii on KSSK-AM, KSSK-FM, KDNN-FM, KHVH-AM, KIKI-FM, KUCD-FM and KHBZ-AM. Each of our station plays an active role in the community and Clear Channel Radio Hawaii has always supported a large variety of local charities and organizations.

In 2007 alone, we helped dozens of local charities including The Hawaii Food Bank, Easter Seals, MDA, MS Society, Aloha United Way, Susan G. Komen, Children's Miracle Network and countless others. Clear Channel Radio Hawaii supported events and initiatives important to these and other local organizations by airing well over \$2 million in airtime for Public Service Announcements, public affairs programs, promotions and on-line support.

We hosted three interns last year and will welcome the next group of interns beginning this fall.

As broadcasters, we recognize the important role we play in our community and we strive every day to build upon the foundation we have built over many years. I urge the Commission not to impose any rules that will create unnecessary burdens and impinge on our ability to continue providing valuable community service.

Sincerely,

Chuck Cotton  
Vice President/General Manager

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