



Federated Media

P.O. Box 2500
Elkhart, Indiana 46515
Telephone (574) 295-2500
Fax (574) 294-4014

April 17, 2008

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Received & Inspected

APR 21 2008

FCC Mail Room

Re: MB Docket No 04-223

Dear Ms. Dortch:

I appreciate the opportunity to send comments regarding the FCC's recent Report on Broadcast Localism and Notice of Proposed Rulemaking (the "NPRM").

Federated Media owns eleven commercial radio stations in Indiana and Ohio. On behalf of Federated Media, I would like to submit the attached documents for the FCC's review. There is no question that many stations have taken advantage of consolidation in order to reduce workforce. In many markets (mostly large markets), this has resulted in less local news, less community involvement and visibility, and potentially decreased the ability of local viewers and listeners to rely on their stations for news and information in critical situations.

I would submit to you that this is not the case with most broadcasters, especially small and medium market broadcasters like us. I feel the FCC is warranted in looking into whether broadcasting has remained local. However, by adopting the proposals set forth in the NPRM, the FCC risks imposing substantial additional and unnecessary regulatory burdens on all broadcasters, including the majority that has remained committed to the principles of localism. That majority of dedicated local broadcasters is being lumped in with a few, big, Wall-Street driven media companies that have forgotten their primary purpose of being a license holder. They are now paying the price for their short-sightedness i.e., dwindling stock market prices, etc. (in other words, a free market economy is taking care of itself).

Being local is critical to any radio station's success. The minute we lose a connection with our communities, we will no longer be a viable business. Since most of our advertisers are local direct, we are likely to lose their support with this type of approach. The smart broadcasters stay "local."

I respectfully submit the following enclosures as written confirmation of Federated Media's commitment to the communities we serve. These exhibits are a recap of just one year of community service ...2007. This is not merely a list of PSA's we've compiled. Each of these pieces of paper has a story behind them ...stories of tragedy, need, cause, philanthropy, political issues, justice, injustice, community information, good will, and more.

I respectfully ask that you reconsider your proposal to increase regulation on "broadcast localism" as it would create undue burden on small and medium market broadcasters in particular.

Respectfully submitted,

Tony Richards
Chief Operating Officer
Federated Media - Indiana

No. of Copies rec'd _____
List ABCDE _____

DOCKET NO.

D4-235

Attachment A

DOCUMENT OFF-LINE

This page has been substituted for one of the following:

o This document is confidential (**NOT FOR PUBLIC INSPECTION**)

o An oversize page or document (such as a map) which was too large to be scanned into the ECFS system.

o Microfilm, microform, certain photographs or videotape.

o Other materials which, for one reason or another, could not be scanned into the ECFS system.

The actual document, page(s) or materials may be reviewed (**EXCLUDING CONFIDENTIAL DOCUMENTS**) by contacting an Information Technician at the FCC Reference Information Centers) at 445 12th Street, SW, Washington, DC, Room CY-A257. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician

3 binders

(see back Table