

Comments (original) in Docket 04-233, the present localism in radio/TV broadcasting proceeding.

Oregon Public Broadcasting comments, a concurring opinion and request that their proposals and concerns be made into rules for NCE broadcasting for Statewide and two-three state regional networks where the served area has common ties.

Oregon Public Broadcasting raises a legitimate concern regarding satellite operation of its network of stations. OPB is one of a number of very responsible local broadcasters who because they operate an educational service for the entire state, and much of the state being rural, cannot afford additional staff to man each and every station all the time.

Therefore, as in Public TV, including PBS stations and regionally-run educational networks, they have found to provide the best quality programming and service for all the citizens of the State of Oregon, they have sought and have authority to operate a main studio in one location and feed out to the rest of the network. They provide meaningful local service with news programming, classical music, public affairs programming, and public service announcements geared to informing the entire state about major issues pertaining to the citizens of Oregon.

Their needs should and must be met as they describe in their recent letters and ex-parte filings. This should apply to any similar local/regional network that services an entire state, part of a state, or a combination of two or three adjoining states where that would meet the public interest.

What should concern the Commission, however, are certain large operators with as many as 500 or more authorizations, who care little for the local communities they actually serve despite claims made on-air to the contrary. These operators may have studios in one location, and broadcast nationwide the exact same content, devoid of local news, weather, public service announcements, civic information, and other items that the statewide public and educational networks do. Even what might be said to 'pass for' public service programming is instead a national program that does not even begin to address the unique needs of the local markets they broadcast into.

Lincoln Nebraska does not have the same needs as Salt Lake City, which in turn does not have the same needs as San Antonio Texas, when it comes to coverage of local issues. You would not advertise a charity dinner benefit for someone in Des Moines Iowa in Phoenix Arizona, but that is the net effect of what these large operators do. That is what the commission needs to very seriously consider in allotting stations, selecting permittees, and renewing licenses in the noncommercial reserved band. In a few places, all the local listeners can receive in the NCE band are these national networks.

I invite responses to these comments, maybe we can work the whole thing out without much

acrimony amongst the various groups on this one.