

I am making the following comments regarding Broadcast Localism as a partner in a group that owns and operates a small FM radio station in Central Missouri. As a newcomer to the radio business, I have learned a great deal in the last two years. In a previous business, I was the purchaser of broadcast advertising. These comments come from the combined perspective of a radio station owner, consumer and listener.

The concept of localism seems to make sense, but in actuality, it will not achieve the desired effect. In addition, there is an inherent unfairness in making rule changes that will cost business owners substantial money and could cost employees their jobs.

Radio has changed dramatically in the last several years. Shows used to be more predominantly local and live. As that became more cost-prohibitive and inconvenient, syndicated shows provided by CD, satellite or internet began to increase in popularity. Now technology allows voice tracking, which provides locally-produced programming without the need for live announcers. This helps return the airwaves to the local market instead of having syndicated programming.

Ownership and management of radio stations seems to have changed as well. More stations seemed to be owned in groups by larger holding companies. This can provide economies of scale regarding operations, but can remove the personal contact of local ownership. The larger ownership groups seem to have figured out that local production and visibility are important in the marketplace.

Competition for listeners has increased as well. Not long ago the primary competition was cassette and compact disc players. Now we have two brands of satellite radio providing many channel options plus iPods and MP3 players offering hours of choices. Radio stations are different because they offer local programming. The stations that do not focus on local activities will suffer in the market.

The city of license is not an important factor for listeners. Most

are not even aware of the city of license for their favorite stations and I am certain that they do not care. Technology allows many employees and businesses to operate remotely. Telecommuting, broadband internet connections, cell phones, Blackberrys and remote conferencing all provide flexibility to businesses. Why would we require radio stations to go backwards in tying them to an arbitrary city of license? This seems counter to every other advance being made in American culture.

My overall theme to the localism issues has been to let the market decide. Listeners who do not want local activities will use satellite radio or their own iPods. Listeners who demand local activities will gravitate toward the radio stations that provide local content. Those that do not will not survive in the marketplace. Requiring localism through additional regulation is unnecessary.

At our station, our small staff is active in the community and has a strong focus on local events. By doing so, we have attracted the attention of our listeners and our local businesses. We did not need localism requirements to be available for public service. We have done so because we thought the market would want it and we were right.

If we were required to eliminate voice tracking, we would not be able to staff the station with live announcers and would have to just have music with no local content. If we were required to man the station when on the air, we would probably be off the air overnight. If we were required to move the studio to the city of license, we would incur great financial hardship because of the cost of moving the equipment—not to mention the long-term lease commitment we have on the present building.

Increasing localism is the right goal, but doing so by these proposed regulations is not the answer. Allow the market to encourage broadcasters to increase localism because it is the better way to run their businesses. I strongly urge the FCC to reject these proposed regulations as an unnecessary burden and an unwise choice.

