

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
FCC Proceeding on) MB Docket No. 04-233
Broadcast Localism)

To: Secretary, Federal Communication Commission

COMMENTS OF SUNBELT-SOUTH TELECOMMUNICATIONS, LTD.

Sunbelt-South Telecommunications, Ltd. (“Sunbelt”), by its counsel, respectfully submits its Comments in the above-referenced proceeding and states as follows:

Sunbelt is the licensee of television station WSST-TV, Cordele, Georgia. Following eight years of public service as a “cable only” operation, WSST-TV started broadcasting over the air in June 1989. It is an independent station in the Albany, Georgia market (DMA no. 146 as of January 1, 2008) and in addition to its broadcast audience, WSST is carried on more than 60 different cable systems in the south central Georgia area. The station prides itself on carrying more live local events (including high school sports, festivals and dedications) and providing more in-station produced local programming (including a 2 ½ hour daily morning program, a live noon hour program, a live 45 minute program by and for teenagers and a live newscast starting at 6 pm) than any other station in south central Georgia. Despite the staggering cost for a small market television station, WSST has made the move from analog to digital. All of this as an independent station in a very small market with a staff of fifteen diverse and dedicated people. Some of what the FCC is proposing in this proceeding will do more harm than good for this station that is unquestionably fulfilling its FCC community service responsibilities.

The FCC Should Continue to Allow Remote Operations of Stations

Eliminating the ability of a station to be operated remotely will cause a tremendous financial burden and a potential hiring problem for WSST and similarly situated stations. The station is currently staffed eighteen hours of each day. To staff that additional six hours per day during the overnight would place a huge burden on this lean and dynamic staff. There are not sufficient funds in the budget to hire another person to cover those hours, so current staff would have to fill the gap. The hours required to “babysit” the station overnight would have to come from daytime hours that these staff members currently spend working on local production, whether on the live shows that air each day, or on the videotaping and editing for broadcast of video coverage recorded “in the field” at various local functions. Rather than promoting more local programming as the FCC suggests it would, staffing WSST twenty-four hours a day would actually reduce the amount of local programming the station produces.

Moreover, there is a security issue. This new FCC rule would force station licensees to hire personnel to sit through “graveyard shifts” at studios that are not always located in well-lit, well populated areas, especially so between the hours of midnight and 5 am or 6 am. The personal safety of those individuals will always be a question for station management to consider.

More Record Keeping Is Not the Way to Improve the Quality or Quantity of Local Programming

WSST is broadcasting probably close to 1,000 hours of locally produced programming every year. Between its daily newscasts and other local shows, plus its coverage of local events

of importance to its community, WSST is exceeding Commission expectations when it comes to locally originated programming. Frankly, its public service accomplishments are exemplary. To ask this station and its staff members to stop the good work that they are doing to file out anything more than the issues/program list it currently produces for its public file would reduce the amount of time they can spend creating the programming that really matters to their community. WSST's completion of the FCC Form 355 would accomplish nothing for its over the air viewers or those who view the station over any of the 60 cable systems where its signal is carried. The added "bookkeeping" that the proposed FCC Form 355 will require is not necessary for all stations. Small stations are run on a lean budget and by nature they are held more accountable to their community viewers and listeners. It would be counterproductive for force WSST to allot more resources to recordkeeping at the expense of resources that could be used to produce local programming.

Sunbelt submits that the proposed recordkeeping requirements concerning programming and maintaining certain percentages of certain types of programming comes perilously close to putting the FCC in the business of regulating program content – a business where it does not belong. Television viewers, especially in this day and age with the enormous number of options available by cable and satellite delivery, decide what they want to watch by either watch the programming on a specific station or not. If viewers do not watch a particular station, then that station will fail.

REQUIRING A COMMUNITY ADVISORY BOARD IS NOT NECESSARY

In this proceeding, the Commission also proposes that broadcast stations be required to establish "community advisory boards" complete with proposed composition and meeting

schedules for such a board. Sunbelt does not see the need for requiring the establishment of such a board for every licensee. Sunbelt, for example, does not need the formality and membership limitations of such a board. At a certain point a large community board becomes too unwieldy to coordinate in meetings and to get agreement on issues and solutions. Instead, Sunbelt and WSST serve as a conduit through which members of the community can be heard to express their views on community issues. Sunbelt is in continuous contact with representatives of all segments of its community, and most community leaders appear on locally produced WSST programming to air their concerns about issues affecting the community and to discuss possible solutions. A far more direct method of disseminating viewpoints than a community advisory board would provide. The station is the best channel in the community for the identification and robust discussion of community issues, as well as the place community members come to learn about the goings-on in and around Cordele. Sunbelt runs hours of live programming every day over WSST and, in its opinion, is in a far better position than the FCC to determine the needs and interests of its local audience.

Conclusion

Sunbelt opposes the elimination of the rule that allows for remote operation of broadcast stations because it will be a very costly burden for many small operators and there is no evidence to show that staffing a station in the overnight hours would actually provide more or better local programming. Sunbelt does not believe the implementation of further recordkeeping with the proposed FCC Form 355 is necessary. Perhaps for stations where the FCC receives specific complaints from local viewers about the amount of local programming or situations where a station does not maintain an adequate issues/program list, the Form 355 could be used as a tool

to monitor a station's future compliance, much like the Enforcement Bureau does now by increasing certain reporting requirements for stations that do not comply with the rules. But to apply the Form 355 burden universally on all stations is a form of regulating content which the FCC is precluded from doing. Finally, mandating a community advisory board will do nothing for Sunbelt. More than likely it will institutionalize and limit the range of voices Sunbelt currently uses in ascertaining the needs, interests and concerns of its community members.

Respectfully submitted,
SUNBELT-SOUTH TELECOMMUNICATIONS, LTD.

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April 28, 2008