

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

---

In the Matter of )

Broadcast Localism )

MB Docket 04-233

To: The Commission

**COMMENTS OF FLORIDA ASSOCIATION OF BROADCASTERS**

Respectfully submitted,

Matthew L. Leibowitz  
Joseph A. Belisle  
Counsel for  
Florida Association of Broadcasters

LEIBOWITZ & ASSOCIATES, P.A.  
1 SE 3<sup>rd</sup> Ave.  
Suite 1450  
Miami, FL 33131  
Tel: 305-530-1322  
Fax: 305-530-9417  
mleibowitz@broadlaw.com

April 28, 2008

## TABLE OF CONTENTS

	Page
Summary .....	i
Broadcasters Serve Local Communities With Significant Amounts of Programming and Information.....	2
Today’s Competitive Media Marketplace Delivers Unsurpassed Quantities of High Quality Information and Programming to Local Communities.....	4
The NPRM’s Community Advisory Board Proposal Should Be Rejected..	8
The NPRM’s Proposed Renewal Application Processing Guidelines Should Be Rejected.....	10
Proposed Procedures to Improve Communications Between Licensees and Local Communities are an Unwarranted Intrusion Into and Burden Upon Licensee Programming Discretion.....	13
Proposed Changes in the Main Studio Rule Will Increase Station Operating Costs Without Providing Any Countervailing Public Interest Benefits.....	14
The NPRM’s Continuous Main Studio Staffing Proposal is Unnecessary and Counterproductive.....	16
Conclusion.....	17

## SUMMARY

The Florida Association of Broadcasters submits that the regulatory initiatives proposed in the NPRM are unnecessary and counterproductive. They proceed from the false premise that broadcasters do not provide programming and information addressing the local interests and needs of the communities they serve. In fact, the 24 years since deregulation of radio and television have produced a competitive media marketplace that offers the public massive amounts of programming and information from numerous and diverse sources. At no time in history has the public had access to more programming and information or to higher quality programming and information than it has today. The new media marketplace is highly competitive and many programming sources compete unimpeded by government-mandated service obligations. Each successive regulation proposed in the NPRM comes at a cost that cannot be justified by countervailing public interest benefits. Proposals requiring mandatory consultation with community advisory boards in connection with programming decisions and establishing minimum quantities of mandatory programming types as a condition of renewal by delegated authority are unworkable and intrude upon protected First Amendment rights of broadcasters. Proposed main studio requirements are both expensive and unrelated to the goals they seek to achieve. Staffing proposals ostensibly designed to improve emergency communications will have no effect on emergency communications other than to force stations off the air. The NPRM is an anachronism unrelated to the modern media marketplace and its proposals should be discarded.

## **COMMENTS OF FLORIDA ASSOCIATION OF BROADCASTERS**

The Florida Association of Broadcasters (“FAB”) submits the following comments in response to the Report on Broadcast Localism and Notice of Proposed Rulemaking, MB Docket No. 04-233, FCC 08-218, released January 24, 2008 (the “NPRM”).

The NPRM proceeds from the false premise that broadcasters, as a general matter, fall far short in airing programming that is responsive to the needs and interests of their communities of license and that this shortcoming arises from the failure of broadcasters to engage in dialogue with their audiences concerning community needs and interests. It reaches these conclusions despite its recognition that the voluminous record demonstrates that some broadcasters devote significant amounts of time and resources to airing programming that is responsive to the needs and interests of the communities of license.

Reasoning from its false premise, the NPRM concludes that “new efforts” are needed to ensure that licensees regularly gather information from community representatives to help inform the station’s programming decisions. The specific regulations proposed could require:

- replacing issues/program lists with the standardized enhanced programming-disclosure report adopted as FCC Form 355
- publication on the internet of the contents of local public inspection files
- internet publication of pre and post filing renewal announcements
- consultation with community advisory boards in connection with program selection
- use of surveys of the general public/focus sessions/town hall meetings to gather programming information

- participation of station managers on community boards/councils and other voluntary public efforts
- use of publicized dedicated telephone number/websites and email addresses to facilitate community dialog

FAB submits that any fair and comprehensive review of broadcasters' local service will demonstrate that the public is well served by the competitive electronic media marketplace in general and by local broadcasters in particular. Such a fair and comprehensive review must also lead to the conclusion that no additional regulation of the broadcast industry is necessary to foster service to local communities.

I. **Broadcasters Serve Local Communities With Significant Amounts Of Programming and Information**

Contrary to the NPRM's conclusion, broadcasters air significant amounts of programming addressing the needs and interests of the communities they serve. An informal survey taken by the FAB of Florida radio and television stations showed the following:

1. Of the thirty (30) responding TV stations, all reported airing news and local programming responsive to the needs and interests of their communities. The stations reported broadcasting on average 1361 minutes per week of local news and programming without consideration of PSAs. In addition, every TV station reported airing PSAs related to local needs.
2. Of the fifty seven (57) responding radio stations, all stations aired local programming responsive to the needs and interests of their communities of license. The stations reported broadcasting an average of 234 minutes per week of local programming, without consideration of PSAs.

Furthermore, stations reported that in many instances, their programming responsive to local issues, was not limited to the traditional news and/or public affairs programming. For example, radio stations reported that even their morning shows, which are viewed as entertainment, often address local community issues. One radio station reported the morning team covered the theft of the local little league's equipment, and not only raised money to replace the equipment but also coordinated additional community support for the local team, including involvement of a major league baseball team. Another station reported a similar response to the theft of computer equipment from the local Humane Society. The morning team raised over \$10,000 in a two day on-air emergency fundraiser to buy new equipment for the Human Society.

All stations responding to FAB's survey broadcast numerous public service announcements addressing local concerns. Florida stations air daily local PSA's addressing every conceivable local activity in the communities. See Attachment A. Last year, Florida TV and radio stations aired well over 500,000 PSA's. Approximately ninety percent (90%) of the PSA's addressed local issues and interests. These spots had a commercial value in excess of Twenty Million Dollars (\$20,000,000).

The citizens of Florida also regard local broadcasters as their life line during emergencies. Florida stations start broadcasting before hurricanes to assist in emergency preparations. During hurricanes, radio stations often re-broadcast TV stations, to provide emergency information to those who have lost power and thus TV service. Finally, Florida stations are integral after the storm to assist in emergency response and rebuilding. In another emergency context, local broadcasters and particularly local radio stations are the backbone of Amber Alerts in our communities.

Responding stations and their employees also participate in local area activities which run the gambit of community groups and programs, including but not limited to local charities, schools, boy/girl scouts, health, sports, public safety, environmental programs, etc. See Attachment B. Participation in these activities not only directly addresses local needs and interests, but also provides a continuing source of information about these local needs and interests for the stations.<sup>1</sup>

FAB submits that the best evidence of the success broadcasters have achieved in serving the needs and interests of their local communities is their audience ratings, as reported by Nielson and Arbitron. Despite competition from a plethora of international, national, regional and local competitors, broadcasters still successfully compete for local audience and local advertising by broadcasting the types of information and programming that local communities need and desire.

## **II. Today's Competitive Media Marketplace Delivers Unsurpassed Quantities of High Quality Information and Programming to Local Communities.**

The FAB is surprised at the NPRM's apparent belief that, 24 years after deregulation of TV and radio, market forces have not increased the information and programming available to serve local problems, interests and needs. There have been numerous, significant changes in the communications landscape in the past 24 years and, if the NPRM is to be believed, none of these changes has contributed to the broadcast of local information and programming. Indeed, the NPRM sees the last 24 years as the era in which the "centerpiece of localism," the communication between broadcasters and the public they are licensed to serve, has been in steady decline. This conclusion is simply baseless.

---

<sup>1</sup> Decades of FCC EEO regulation have resulted in a diverse broadcast industry workforce comprised of persons from numerous significant community groups. Stations rely on this additional resource in formulating programs serving local communities.

At no time in history has the public had access to more information and programming choices than it does today. The information and programming available right now to serve local problems, interests and needs is an order of magnitude greater than that available 24 years ago. At the end of 1984, there were 1,194 full power television stations operating in the United States. As of December 31, 2007, that number was 1,759, exclusive of companion DTV stations. In 1984, each television station was capable of broadcasting a single analog signal. Today, each digital television station is capable of transmitting multiple streams of video programming. In 1984, there were three national commercial television networks. Today, there are five. In 1984, there were 4,888 FM stations operating in the United States, each capable of transmitting a single channel of analog programming. Today, there are 9,201 FM stations, many of which are capable of transmitting both analog and digital programming streams. The number of AM stations has held relatively stable since 1984 (4,754 in 1984 versus 4,776 today). In addition, the public now has service from 831 low power FM stations that did not exist in 1984. Moreover, the number of low power television stations serving the public has increased from roughly 130 in 1984 to 2,295 today. All of these broadcast stations serve their local communities.

In 1984, a consumer's programming and information choices were largely limited to the offerings of the local newspapers, broadcast stations, cable systems and the VHS tapes available at the local video rental store. In the last 24 years, each of these outlets has dramatically increased its capacity to deliver information and programming. TV stations, radio stations, and newspapers today post information on their websites accessible over the internet and readers can view this local news anywhere in the world. The growth of the internet and high speed broadband access has provided consumers yet another means of obtaining desired information and programming. Today's internet is capable of delivering streaming audio from numerous

internet radio sites worldwide. Similarly, streaming video and video downloads are available from numerous sites worldwide. Internet technology has offered consumers access to numerous specialized websites, including sites dedicated to local government, news, weather, opinion, arts and shopping. Name a subject, and someone, somewhere is discussing it on the internet.

Cable systems have greatly upgraded capacity since 1984 and have launched numerous new cable channels addressing a wide spectrum of interests and needs.<sup>2</sup> In fact, the Commission has recently taken major steps to increase local programming on cable systems by revising cable lease access requirements.<sup>3</sup>

As cable penetration has expanded, from 20 percent of television households in 1980 to approximately 70 percent of television households today, other media were added to the mix of information available to today's consumer.

In 1994, USSB and Direct TV began direct satellite broadcasts to 18 inch home dish antennas. This was followed in 2001 by the inauguration of satellite radio, with XM Satellite Radio offering 200 channels of radio nationwide. In 2002, Sirius Satellite Radio launched a second nationwide satellite radio service.

To further increase availability of information the FCC has taken many steps to encourage wireless internet throughout the Country. Recently, the Commission introduced the availability of Wi-Fi and WiMax.

---

<sup>2</sup> Cable channels launched since 1984 include: Arts & Entertainment Network, American Movie Classics, Lifetime, Discovery Channel, Home Shopping Network, VH-1, C-Span2, QVC, Travel Channel, Telemundo, Turner Network Television, CNBC, The Inspiration Network, Court TV, Encore, Comedy Central, Cartoon Network, SciFi Channel, ESPN2, Television Food Network, FX, Home and Garden TV, International Film Channel, Starz, Trio, the Game Show Network, Turner Classic Movies, CNN/fn, the Golf Channel, Great American Country, the History Channel, the Outdoor Life Network, Animal Planet, Fox News Channel, MSNBC, the Sundance Channel, TV Land, WE, BBC America, the Biography Channel, Cinemax, Tech TV, Toon Disney, Oxygen, ABC Family, Hallmark Channel, National Geographic Television, Spike TV, and TV One.

<sup>3</sup> See Leased Commercial Access, 23 FCC Rcd 2909 (2008).

More recently, the Commission has completed its auction of 700 MHz spectrum and the nation stands poised to inaugurate new competitive mobile internet services based on advanced wireless technology. Soon people will be linked to the internet wherever and whenever they desire. You can be sure that mobile internet delivery of audio and video programming will play a significant role in the next generation of wireless video mobile services, which will allow local TV broadcasters to stream local programming to their communities via wireless mobile devices.

Given the numerous and significant media advances, there is absolutely no need in 2008 to rewind the regulatory clock 24 years and adopt the framework that governed broadcasting prior to radio and television deregulation. Competition among broadcasters *inter se* and competition among broadcasters and other media have resulted in the creation of an electronic media marketplace that permits anyone, anywhere to access any desired information, including local programming anytime. This new world of electronic media is extremely competitive, and broadcasters must continue to attract local audiences who have numerous alternative entertainment and information options.<sup>4</sup>

FAB submits that each of the proposed regulations that the NPRM seeks to impose on broadcasters in the name of localism comes at a cost that deprives broadcasters of resources that could otherwise be devoted to competing in today's media marketplace by serving their local audiences. The NPRM's proposal to increase regulation will result in decreased broadcast competitiveness, undermining the media marketplace competition that has given today's

---

<sup>4</sup> Broadcasters' competitors in other media are relatively unfettered by government content regulation, even though they, like broadcasters, use public airwaves and public rights of way to disseminate their information. This is particularly true of internet-based content providers who are free to transmit any program worldwide over the facilities of wireless, wireline and other broadband systems without any government-mandated service obligations. Today, for instance, Warner Brothers Television Group announced the launch of two advertising-supported websites offering the programming originally broadcast on the WB Broadcast Network. The promotional material for the sites announced that "the next great network will not be televised."

consumer access to entertainment and information services unparalleled in history. The NPRM's brand of artificial localism comes at a high price and is an unnecessary burden on a competitive marketplace.

### **III. The NPRM's Community Advisory Board Proposal Should Be Rejected.**

Relying on unsupported assumptions, the NPRM tentatively concluded that each station should have a board of community advisors, which meets on a quarterly basis, to provide improved access by the public to station decision makers. The board would be made up of officials and other leaders from the service area, including under-served groups.

Again, FAB submits that the NPRM's conclusions are divorced from reality. Broadcasters, unlike most other participants in the competitive media marketplace, survive and prosper because of their connection to the local community. Again, the best evidence of broadcasters' service to the local community are the Nielson and Arbitron ratings, showing beyond any question the value the public places on broadcast service. Local audiences have a wide choice of local, regional, national and international media to meet their needs for entertainment and information, but they continue to choose local radio and local television stations. This is no accident. Day in and day out, no one does a better job of meeting local needs for information and entertainment than local broadcasters.

The responsiveness of broadcast service to local needs and interests should not come as a surprise. As the Commission recognized in 1984, local broadcasters do not live and operate in a vacuum. They live in their communities. They are exposed to local newspapers. They go to religious services, attend schools, vote in local elections, and participate in community activities, including, but not limited to, the Chamber of Commerce, local urban leagues and the Special

Olympics. See Attachment B. Thus, they are acutely aware of the local needs and interests of their own community.<sup>5</sup>

While it is true not every radio and television station serves all facets of their local community, the Commission stated twenty-seven years ago that it did “not expect radio broadcasters to attempt to be responsive to the particular problems of each group in the community in their programming.”<sup>6</sup> Rather, the Commission relied on commercial radio and television broadcasters to take into account their listenership and its interests and the services provided by other radio and television stations in the community to groups other than its own listenership<sup>7</sup>

In 1984, when the Commission ended the formal ascertainment requirements for television, it engaged in a cost benefits analysis that concluded that the potential benefits of the formal ascertainment process did not justify the costs and burdens the process placed on broadcasters. The proposed community advisory board should be subjected to a similar cost benefits analysis. Take, for instance the Miami-Fort Lauderdale market where there are 46 commercial radio stations and 15 full power television stations.<sup>8</sup> Under the NPRM's proposal, these stations would be competing for community leaders to serve on fifty eight community advisory boards. Even in a smaller market like Tallahassee, Florida where you have 18 commercial radio stations and 8 television stations, broadcasters are still faced with staffing 26 community advisory boards.<sup>9</sup> Just staffing all these boards will be a logistical nightmare.<sup>10</sup>

---

<sup>5</sup> Deregulation of Commercial Television, 98 FCC 2d 1076; 56 RR 2d 1005, 1024 (1984)

<sup>6</sup> Deregulation of Radio, 84 FCC 2d 968, 978 (1981).

<sup>7</sup> Id.; and Deregulation of Commercial Television, 56 RR 2d at 1014-1015.

<sup>8</sup> See BIA Investing In Radio Market Report 2007 for Metro Rank 12; and BIA Investing In Television Market Report 2007 for DMA Rank 16.

<sup>9</sup> See BIA Investing In Radio Market Report 2007 for Metro Rank 164; and BIA Investing In Television Market Report 2007 for DMA Rank 108.

Coordinating the schedules of numerous busy board members to actually convene a board meeting will require an inordinate effort on the part of all participants. These boards place a heavy burden on both stations and community leaders.

Finally, the FAB has a strong First Amendment concern with respect to any regulation conditioning broadcast speech upon use of these boards. As the Commission recognized in 1984 the prior compulsory ascertainment process raised potential First Amendment concerns. Under the prior ascertainment regime, community leaders were limited to commenting on issues and needs of the community and prohibited from commenting on station programming. The Commission clearly drew this line to protect the editorial integrity of the stations.<sup>11</sup> However, in the new community advisory board process, this bright line will be blurred by advisory board members seeking access to the airwaves, not just to station decision makers.

The Commission has previously recognized that unfettered editorial discretion must rest with the stations. The proposed boards are a clear intrusion into this First Amendment right and must be rejected.

**IV. The NPRM's Proposed Renewal Application Processing Guidelines Should Be Rejected.**

Relying on “some commenters”, the NPRM advances the notion that broadcasters are not complying with their obligations, as public trustees, to air “sufficient programming that is responsive to local needs and interests.”<sup>12</sup> It also expresses concern for a “perceived” but undocumented continual decline in the amount of news.<sup>13</sup> The NPRM goes as far as to voice

---

<sup>10</sup> How many boards can the Mayor of Miami-Dade County or the Director of the County Health Department sit on and actively participate?

<sup>11</sup> See Primer on Ascertainment of Community Problems by Broadcast Applicants, 27 FCC 2d 650 (1971)

<sup>12</sup> NPRM at para. 34

<sup>13</sup> NPRM at para. 36

concern that broadcasters are failing to develop and promote local artists and foster musical genres, confusing the role of broadcasters and music promoters.

Based upon this flimsy record, the NPRM proposes to reintroduce programming-based renewal application processing guidelines. These guidelines would restrict the Media Bureau's authority to grant renewal applications by delegated authority and refer non-compliant applications to the full Commission for action.

The FAB strongly objects to the reintroduction of these so-called guidelines. In practice, broadcasters will be compelled to conform their programming decisions to the "guidelines" or risk potentially adverse Commission action on their renewals and the substantial costs related thereto.<sup>14</sup> This is a significant intrusion on Broadcaster's First Amendment rights. As the Commission stated in 1984, when it eliminated the prior processing guidelines, "Congress intended private broadcasting to develop with the widest journalistic freedom consistent with its public interest obligation. Moreover, the public interest standard necessarily invites reference to First Amendment principles. These concerns with the First Amendment are exacerbated by the lack of a direct nexus between a quantitative approach and licensee performance."<sup>15</sup>

Further, the FAB notes that while the FCC seeks the establishment of processing guidelines, it does not even attempt to address the question of what programming standard the full Commission will actually apply to evaluate renewal applications referred to it by the Media Bureau. This comes as no surprise. First Amendment concerns incorporated into Section 326 of the Communications Act clearly come into play at that point. This whole programming

---

<sup>14</sup> These costs not only include large legal fees, but include disruption of station management called to support the renewal effort.

<sup>15</sup> Deregulation of Commercial Television, 56 RR 2d at 1016.

guideline approach to regulation places the Commission on a slippery First Amendment slope that must be avoided.<sup>16</sup>

The NPRM is also in direct conflict with the 1981 and 1984 Commission actions deregulating radio and television. Therein, the Commission rejected any “rigid mold or fixed formula” for station operation, preferring instead to rely on competition in marketplace of media to serve programming needs.<sup>17</sup> The 24 years since deregulation have seen enormous growth in the competitive media marketplace. In 1981, the Commission said it would only intervene when it determined the marketplace has failed.<sup>18</sup> Today, in 2008, the only credible evidence shows that 24 years of free competition have provided the public with an unparalleled level of information and programming services. Radio and television stations continue to provide local programming addressing the needs and interests of their community, even in the face of pervasive competition from numerous new media. The media marketplace has not foundered, and the Commission should not impose the NPRM’s burdensome proposals.

FAB notes that, in 1984, the Commission also explicitly rejected the idea that there is a nexus between a licensee meeting quantitative guidelines and the licensee meeting its local programming obligation. Specifically, the Commission stated:

The Commission’s traditional policy objectives with respect to programming have never been fulfilled by the presentation of mere quantities of specific programming. On the contrary, the Commission has consistently sought to avoid this type of regulatory approach. Moreover, the Courts have recognized

---

<sup>16</sup> Indeed, the Commission’s own cases provide little support for denying license renewals on the basis of lack of programs addressing local needs and interests. The case that comes closest to this constitutionally sensitive issue is Simon Geller, 102 FCC 2d 1443 (1985), where the Commission denied Geller’s renewal expectancy based on his station’s failure to broadcast any local news, public affairs or other programming addressing ascertained needs and interests of the local community. However, the Commission did not disqualify Geller from holding a broadcast license, even on this extreme fact pattern, and ultimately renewed his license.

<sup>17</sup> Deregulation of Radio, 84 FCC 2d at 983.

<sup>18</sup> Id. at 976

that quantity, in and of itself, is not necessarily an accurate measure of the overall responsiveness of a licensee's programming. Instead, a licensee's programming obligation has always been described in terms of providing programming that responds to the needs of the community. Thus, the existing quantitative structure significantly misrepresents the nature of a broadcaster's underlying programming obligation by incorrectly suggesting that the broadcasting of specified quantities of programming is enough to fulfill their traditional programming responsibilities.<sup>19</sup>

In rejecting quantitative processing guidelines, the Commission concluded the primary regulatory concern was and remained that broadcasters should present information on public issues, that the public should be informed, and that the information should come from diverse sources.<sup>20</sup> This must be the FCC's regulatory policy in today's competitive media marketplace. There is simply no question that television and radio stations continue to provide their local communities significant information with respect to local needs and interests and thus there is no need for the NPRM's type of regulatory approach.

**V. Proposed Procedures to Improve Communications Between Broadcast Licensees and Local Communities are an Unwarranted Intrusion Into And Burden Upon Licensee Programming Discretion.**

The FCC has no legitimate regulatory interest that justifies regulating the process by which licensees select their programming. Section 326 of the Communications Act of 1934, as amended<sup>21</sup>, expressly prohibits the Commission from promulgating any regulation or condition which interferes with the right of free speech by means of radio communication. The regulatory processes the NPRM seeks to impose on broadcasters are an unnecessary burden upon and intrusion into protected programming decisions.

Specifically, the NPRM is not concerned with controlling the selection of entertainment programming on stations. It seeks, instead, to control the process by which news, public affairs,

---

<sup>19</sup> Deregulation of Commercial Television, 56 RR 2d at 1016-1017.

<sup>20</sup> Deregulation of Radio, 84 FCC 2d at 980.

<sup>21</sup> 47 U.S.C. §326

political and other non-entertainment programming serving the public is selected. These are the most sensitive types of speech in which a station engages and are exactly the areas where a broadcaster's right to free speech should be most protected. No broadcaster should be required to convene a community advisory board as a condition of selecting programming. No public interest is vindicated by requiring broadcasters to file quarterly programming reports quantifying and categorizing every minute of programming broadcast over their stations. No license renewal standard should impose upon broadcasters minimum amounts of government-mandated speech. These odious proposals are beyond the legitimate authority of the Federal Communications Commission.

**VI. Proposed Changes In The Main Studio Rule Will Increase Station Operating Costs Without Providing Any Countervailing Public Interest Benefits.**

With respect to the NPRM's proposal to reinstitute the pre-1987 requirement that main studios be located within a station's community of license, the NPRM suggests that this arrangement is justified by Section 307(b) of the Communications Act. However, Section 307(b) simply imposes upon the Commission the responsibility of making a fair and equitable distribution of radio service among the several States and communities. It says absolutely nothing about studios, main or otherwise. FAB submits that if Congress intended main studios to be a central theme of Section 307(b), some variant or equivalent of the word "studio" would appear somewhere in the statute.

In response to the Commission's deregulation of the main studio locations, broadcasters moved studios, in many instances combining studios with other co-owned stations and even in some instances sharing facilities with other broadcasters. These studio relocations and the associated new construction cost millions of dollars and in many instances required long term

borrowing and/or long term leases. The proposed new rule will require broadcasters to terminate long term leases, sell buildings and, in some cases, will result in default of credit agreements.

Further, the cost on small broadcasters will be substantial. For instance, one local group owner has co-located five small market radio stations. Under the proposed rules, he would have to build two new studios at a cost of approximately \$30,000 each, rent two new spaces and staff each new main studio. These costs will greatly diminish his local programming budget.

Moreover, there is no evidence to support the NPRM's theory that moving the studio would benefit localism. It is wholly illogical to assume that there is any correlation between the location of a main studio and a station's local programming to address local needs and interests. In fact, members of the community and even community leaders rarely visited main studios, even when they were required to be located in the city of license. Today's main studios are primarily technical facilities and business offices. The notion that coming to the main studio is somehow similar to going to Speaker's Corner in Hyde Park is pure fiction. Similarly, there is no basis between the location of the main studio and access to senior management. Further, even in the days of formal ascertainment requiring community leader interviews, those meetings often took place outside the stations, because many stations did not have facilities to accommodate these meetings.

Similarly, the supposed linkage between access to the public file and localism is also built on a fictitious base. For decades, broadcasters have observed that few if any persons visit stations to inspect public files, perhaps only one a year, and most likely only broadcasting students.

Accordingly, the reinstatement of the main studio rule is unlikely to have any positive impact on the quality of local programming services, but it is very likely to have a significant

negative impact on broadcast station finances. Today, when the new competitive media market is putting the most strain on broadcaster's resources, and during a time of severe and prolonged financial difficulty for stations, requiring substantial new expenditures for new studios of funds that might otherwise be devoted to improved programming services for local communities is bad policy. This will produce the opposite of the programming result the NPRM seeks to obtain from its main studio proposal.

**VII. The NPRM's Continuous Main Studio Staffing Proposal Is Unnecessary and Counterproductive.**

With respect to disaster warnings, the FAB supports responsible efforts to make emergency information available to all broadcast listeners/viewers. However, the Commission's policy in this area should set realistic goals and leave broadcasters a measure of flexibility in determining how to achieve these FCC-mandated results. In this connection, FAB notes that the NPRM's proposal to have broadcast studios staffed continuously is not necessary to insure prompt emergency warnings from the emergency alert system and will have unintended negative consequences affecting the integrity of the emergency alert system.

As the Commission has recognized, Florida, in large measure due to the participation of the FAB, has the most advanced and effective emergency alert system in the Country.<sup>22</sup> This system operates automatically and does not require a staffing presence at every station's studio. In fact, there have not been any failures in the Florida system arising due to the absence of staff. Quite the contrary, the system has served the citizens of Florida for years without this requirement. Rather stations voluntarily increase their staffs in times of emergency to better serve their communities with emergency programming, not to operate the EAS.

---

<sup>22</sup> For details in the Florida Emergency Alert System, see the FAB website at [www.FAB.org](http://www.FAB.org) and click on "Emergency Alert System".

In fact, the NPRM has failed to recognize the very real public interest danger associated with requiring continuous staffing of broadcast stations. Specifically, late night operations do not generate significant revenues for many stations, and for this reason, these stations use automated equipment. If the cost of late night operations is increased by additional staffing requirements, many stations, especially small broadcasters, will simply sign off at midnight and return to the air for morning drive time. This is especially true for the numerous small radio stations here in Florida. One Florida station estimated the increased cost of staffing its five small radio stations to be approximately \$350,000 a year, which would result in a decrease of 27% of net revenues. This loss will directly adversely impact local programming. Stations that are not on the air are not retransmitting EAS activations and this is exactly the result the NPRM seeks to avoid.

### **VIII. Conclusion**

The NPRM proceeds from the false premise that broadcasters do not communicate with their local communities. Reasoning from this falsehood, the NPRM concludes that government regulation is necessary to insure that broadcasters “regularly gather information from community representatives to help inform the station’s programming decisions.”

The short answer to the NPRM’s barrage of regulatory proposals is that the programming and informational needs of local communities are well served by the current free market process of program selection. In fact, there has never been a time when the United States public has had access to more programming or to better programming or to more diverse programming than today. This includes access to local programming by broadcasters. The idea that government regulation is needed to cure some sort of programming-related deficiency is wholly baseless. The NPRM’s litany of proposed regulations to purportedly enhance local programming by

broadcasters is completely unnecessary and counterproductive. The proposals set out in the NPRM with respect to (a) regulating licensees' program selection process, (b) imposing license renewal processing "guidelines," (c) changing main studio location rules, and (d) requiring continuous main studio staffing for emergency broadcasting, must be rejected.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Matthew L. Leibowitz', with a long horizontal flourish extending to the right.

Matthew L. Leibowitz  
Joseph A. Belisle  
Counsel for  
Florida Association of Broadcasters

LEIBOWITZ & ASSOCIATES, P.A.  
1 SE 3<sup>rd</sup> Ave.  
Suite 1450  
Miami, FL 33131  
Tel: 305-530-1322  
Fax: 305-530-9417  
mleibowitz@broadlaw.com

April 28, 2008

## ATTACHMENT A

### Sample of Local PSA's Run by Florida Radio Stations

10 Steps to Starting Your Own Business  
2nd Annual Wing Bowl  
65 Roses Golf Classic  
7th Annual Ocala Greek Festival  
911 Cell Phone  
A Symphony for Life  
Ad Council: Autism Awareness  
Ad Council: Childhood Obesity Prevention  
African-American Research Library  
African American Society: Chocolate After Dark  
AIDS Awareness  
AIDS walk  
Air Force Reserve Protect & Serve  
Air Potato Round Up  
Air Potato Round-Up  
Al-Anon Excuses  
Al-Anon Excuses  
Alcoholics Anonymous  
Alcoholics Anonymous Underage Drinking SAMHSA  
All Children's Hospital Telethon  
All Jazzed Up Auction  
Alonzo Mourning Charities  
Alzheimer's Family Organization Luncheon  
American Academy of Dermatology: Tanning Danger  
American Diabetes Association: I Decide  
American Heart Foundation: Go Red  
American Lung Association: Faces of Influenza  
American Red Cross: There is a Place  
American Veterinary Medical Association: Being a Pet is Risky Business  
Angel Tree  
Apollo Beach Manatee Arts Festival  
Arbor Day Foundation: Replanting National Forests  
Are You Ready Ad Council  
Army National Guard Reflection of Honor  
Art of Helping Children  
Asia Fest  
ASPCA: John Goodman  
ASPCE Cruel's Not Cool  
Aspect Foundation  
Asthma Walk 2007  
Astronaut Recruitment  
Astronaut Recruitment  
At Least 3 Days Supplies  
Autism Speaks  
Back to School Fair

Ballet Hispanico  
Ballet Pensacola  
Bark-a-Tecture  
Battle of the Bands  
Be a Player  
Be a Player Shrek  
Be a Teacher  
Be a Teacher  
Be a Visionary Walk  
Be Ready (FEMA & NAB)  
Beacon Awards  
Beautiful Day USA (WWF)  
Bereaved Parents USA  
Best of Tampa Bay  
Beulah Volunteer Fire Department  
Big Brothers/ Big Sisters  
Bikers on Parade  
Bikers on Parade  
Black History Month  
Black Tie and Tails  
Blood Drive  
Bob Hayes Track Meet  
Bobby Holloway Memorial Fishing Tournament  
Boots & Pearls Ball  
Boss of Bad Guys  
Bowl for Kids Sake  
Bowl for Kids Sake  
Bowling for MDA  
Boy Scout Food Drive  
Boys and Girls Town National Hotline  
Brehon Institute: Baby Calendar  
Bridge of Northeast Florida  
Bridge the Gap  
Brooksville Raid Festival  
Broward County Youth Empowerment  
Builders Care  
Burn Up Hunger in Marion County  
Business Expo & Job Fair  
Caddy for a Cure  
Caddy for a Cure  
Calle Ocho Cooking  
Camillus House  
Cape Coral 5K for Breast Cancer  
Captain Fun/ Jubilee  
Carnaval on the Mile  
Cash for Kids Poker Tournament  
Catholic Charities Gala  
Cattle Barons Ball  
Celebrity Sports Auction  
Central Florida Ballet

Chamber Gala  
Chevy Safe Kids of Florida  
Child Abuse Awareness Luncheon  
Childcare Resource Center  
Children's Advocacy Center  
Children's Health Fair/Surf's Up  
Children's Home Society  
Children's Miracle Network  
Christmas Assistance  
Chrome Divas Poker Run  
CIS City Street  
City Kids Art Factory  
Clara White Mission Everyday  
Clarke Jacksonville  
Clay County Humane Society  
Clean Up Tidal Flats  
Click It or Ticket  
Coalition for Drug Free Southwest Florida  
Coats for Kids  
Coconut Creek 5k Run  
Code Red  
Coloring Book Pyramid  
Coloring Book Pyramid  
Community Connections  
Community Hospice: Quality of Life  
Community Relations Shands Hospital  
Corey Dahlem Memoria  
Corey Dahlem Memorial  
Cornerstone Chili Cookoff  
Cotee River Seafood Festival  
Council on Aging: Senior Chill Out  
Country Rocks the Canyon  
Covenant Hospice Mask Parade  
Covenant Hospice: Art of Fashion  
Crab Races of Tween Waters  
Cram the Van: School Supplies  
Crime Prevention Banquet  
Crimestoppers  
Crohns & Colitis Foundation  
Cuban Ballet  
Cubfest 2007  
Cue Cards  
Cut-A-Thon for Cancer  
Daily Bread Food Drive  
Deep Carnivale  
Defenders of Wildlife: Kidsplanet.org  
Department of Corrections Recruitment  
Department of Health & Human Services: Alcohol/Drug Awareness  
Depression is Real Coalition: Elevator

Designer's Showhouse  
Destin Chamber of Commerce: Destin Seafood Festival  
Diabetes Expo  
Diamonds Are Forever Benefit  
Dignity U Wear  
Dignity U Wear  
Dog Adoption Festival  
Don Quijote Awards  
Donate Life Florida  
Downtown Arts Festival  
Downtown Ecumenical Services Council  
Dreams Come True  
Dropout Prevention  
Dropout Prevention-Dad  
Dropout Prevention-Mom  
Drug Free Charlotte County  
DTV Caption Aware  
Dudley's Dental Island ADA  
Duval County Property Appraiser  
Early Learning Coalition  
Earth Share: One Earth  
Ebony Banquet  
Ebony Fashion Show  
Edison Pops Concert  
Empty Hanger Program  
Ermita De La Caridad  
Escambia County School District: Be There  
Experience Works  
Expose the Truth About Breast Cancer  
FAB High Definition Television  
FAB/ Dept. of Agriculture: Tankless Waterheaters  
FAB/ FL Army National Guard  
FAB/ FL Dept. of Emergency Management  
FAB/ FL Healthy Kids  
FAB/ Ounce of Prevention  
FAB/ US Coast Guard Shield of Freedom  
FAB/DBPR Credentials  
FAB/Dept. of Corrections  
FAB/FANG Reflection Honor  
Family Film Festival  
Family Fun Day  
Family Support Services  
Fanconi Anemia Rock & Roast  
Father's Day Frosty Weekend  
FCCJ Artist Series  
Festival De La Parroquia St. Brendan  
Festival De Sabores  
Festival of Trees  
Fiesta by the Bay  
Fiesta Five Flags

Fiesta Medina  
Fight for Kindness  
Fight for Kindness  
Financial Pitfalls Ad Council  
Fire Prevention for FL Everglades  
Fireball Run  
Firefighter of the Year  
Fireworks Fund Drive  
First Book: Reading with Bobby  
First Time Homebuyers Workshop  
FIU Annual Fund  
Five Points of Light Marathon  
Florida Chamber Orchestra  
Florida Division of Forestry: Prevent Forest Fires  
Florida Film Festival  
Florida Georgia Blood Alliance  
Florida Gulf Coast University Student Govt.  
Florida Healthy Kids  
Florida Job Expo  
Florida Panthers Career Expo  
Florida Pre-Paid College Board  
Florida WineFest and Auction  
Florida Yard Fandango  
Florida Youth Challenge  
Florida Youth Challenge Tom McManus  
Flu Shot Awareness  
Folic Acid Babies  
Folic Acid Babies  
Food Addicts & Controlling the Way you Eat  
Food for Families  
Foreclosure Prevention  
Foreclosure Prevention  
Foster Care PSA  
Foundation for a Better Life: Taxi  
Foundation for Excellence: We Believe in Children 5K Run  
FPL Energy Efficiency  
Friends of the Christmas Parade  
FSU Nole Fest  
Ft. Lauderdale BTS Drive  
Gainesville Area's Women Network  
Gainesville Chamber Orchestra  
Gear Up Buckle Up  
Get Up and Play LPGA  
Get Up and Play LPGA  
Gina D's Kid's club: Let's Get Fit!  
Girl Scouts  
Girls Inc. Golf  
Global Peace Film Festival  
Golf Tournament  
Good for Children

Goodwill  
Goodwill Inauguration  
Goodwill Industries of Southwest Florida  
Goombay Festival  
Gracefest  
Great Gulf Coast Arts Festival  
Greenscape of Jacksonville  
Grove House Developmental Services  
Gulf Coast Foundation Golf  
Habit for Humanity Strawberry Festival  
Habitat for Humanities  
Haney Job Fair  
Harry Chapin Food Bank  
Harry Potter Pet Parade  
Harvest Moon Craft Show  
Haunted House  
Healthy Children  
Healthy Mothers, Healthy Babies  
Hearing Loss in the US  
Heart of Florida Air Show  
Heart of Florida United Way  
Heart of Florida Wing Bowl  
Hearts of Gold  
Help Lane Hevel  
Hernando Youth League  
High Roller Hounds Night  
High School Basketball/Physical Fitness  
High School Drop Out Council  
Hispanic Achievers  
Hispanic Chamber Gala and Job Fair  
Hispanic Heritage Month  
Historical Preservation Society of Ocala  
Holiday Lights of Orlando  
Holiday Tree Lighting Festival  
Hooked on Education  
Hot Dogs & Cool Cats  
Hotter Than July Adopt a Pet Party  
Houndhaven  
House of Hope  
House of Rock Silent Auction  
Howl-O-Ween  
HS Prevent Dropout Josh  
Hurricane Hunters Air Force Reserve  
Hurricane Seminar  
Inaugural Clays for Kids  
Internet Safety Campaigns  
Jacksonville Children's Chorus  
Jacksonville Film Festival  
Jacksonville Orchid Society  
Jacksonville Public Libraries

Jaguars Playbook  
Jax Events  
Jax Zoo  
Joint Man (PDA)  
JU Dental School of Orthodontics  
Junior Museum Heritage Festival  
Karaoke for the Cure  
Keep Schools Safe  
Kid's Heartbeat  
Kidfest  
Kidfetti  
Kids 4 Better Life: Generosity  
Kids Challenge  
Kids Program Preempt  
Kids PSA  
King Tut Exhibit  
Know Your Rights  
Kumquat Festival  
Kuumba Festival  
Lee & Collier County Top Cop  
Lee Memorial Health Patient Safety  
Leesburg Bikefest  
Leisure Time for Your Lifetime  
Library of Congress: Forest  
Life Management Home Tour  
Light the Night  
Light the Night/Gainesville  
Light the Night/Ocala  
Light up Lake Lillian  
Lighthouse Lacrosse Festival  
Little Everglades Steeplechase  
Little Flower (EPA)  
Live Earth Concert Broadcast  
Local Postal Food Drive  
Local Recording Artist Plies  
Love Your Library Month  
Lowry Park Zoo  
Lucky 7 Fishing Tournament  
Lucky Ducky Derby  
Maitland Art Festival  
Make A Wish  
Make a Wish Foundation: Superhero  
Making Strides/Gainesville  
March for Babies/ Gainesville  
March of Dimes  
Mardi Gras Parade  
Marines for Country  
Marion Therapeutic Riding Association  
McGruff School For Scoundrels  
Memorial Cubano

Memory Walk/Gainesville  
Miami Book Fair  
Miami Film Festival  
Military Band Concert  
MLK Day Rally  
Move Over Tallahassee Fire Department  
Multiple Sclerosis Dreams  
Music Meets Special Needs  
My Safe Florida Home Fair  
My Story Jered  
NAIC Stop Call Confirm  
Narconon  
National Credit Ad Council  
National Geographic: My Wonderful World  
National Kidney Foundation  
National Wildlife Federation  
Night of a Thousand Thieves Auction  
Night of the Iguana  
Northwest Florida Blood Center  
NSF Florida Council on Compulsive Gambling  
Nutrition Education Balance  
Nutrition Education Pyramid  
Nutritional Education Balance  
Oasis: Dining Out for Life  
Ocala Lightning Girls Soccer  
OK to Say No  
Okaloosa Island: Winterfest  
Olive Baptist Church  
Online Predators Congressman Mario Diaz Balart  
Operation Christmas Child  
Operation Christmas Child  
Operation Twinkle  
Orlando Philharmonic  
Orlando Repertory Theatre  
Ounce of Prevention  
Out of the Darkness 5k Walk  
Overtown Youth Center  
Parents Helping Teens  
Partnership for a Drug Free America: Shrinking Steroid  
Pause for the Caws 3K Dog Walk  
Paws in Motion  
Paws in the Park  
Paws on the Catwalk  
Peace Corps: Life is Calling  
Pensacola Heritage Foundation: Evening in Seville  
Pensacola Little Theater  
Pensacola Museum of Art  
Pensacola Opera  
Pensacola Pelicans  
Pensacola Sertoma

Pensacola Sports Association: Double Bridge Run  
Phil Stacey Children's Choir  
Physician's Health Expo  
Pinellas Living Green Expo  
PJ in the Park  
Plant City's Dancing with the Stars  
Play Sixty  
Play Sixty  
PODS Championship Golf  
Postal Food Drive  
Pre-Hurricane Season Blood Drive  
Prevent Blindness  
Preventative Car Maintenance  
Professor Tinkermeister Get a Plan  
Project Road Block  
Project Roadblock  
Project SOS  
Protect Our Water  
Protecting Marriage/Catholic Community of S. FL  
Quest for Hope  
Race to Live: FSU Sorority  
Reckless Driving  
Red Cross: Change Life  
Reeling 4 Kids  
Reeling 4 Kids  
Regis House  
Relay for Life  
Relevo Por La Vida  
Rick Wilkins Foundation  
Rodenheaver Boys Ranch  
Ronald McDonald House  
Ronald McDonald House  
Run with the Big Dogs Poker Run  
Runaway Love  
Sacred Heart Fall Festival  
Sacred Heart Foundation: Mall Ball  
Saenger Theatre Fundraiser: Get Back  
Safe Fourth of July Fire Prevention  
Safety at Sea Expo  
Sand Sculpting Championship Festival  
Santa Rosa Arts & Culture: Get a Taste for Art  
Sarasota Selby Gardens Annual Lights in Bloom  
Scholarship Golf Tournament  
School Registration Deadline  
Second Hand Smoke  
Senior Friendship Centers  
Senior Games, Egg Hunt, Summer Movies  
SFCC Great Gainesville Road Race  
Shake-Rattle-Dance/Seniors  
Shands Jacksonville

Sharks Tooth Festival  
Sheriff's Ranchers RV Donation  
Simon Mall Evening of Giving  
Southern Women's Show  
Southwest Florida Addictions Services  
Sparklebration  
SPCA Day at the Rays  
St. John's Festival of Trees  
St. Patty's Day Poker Run  
Starr Athletics: Panhandle Shootout  
Stay Safe Online: Cyber Security  
Steinway Society  
Step up for Students  
Stepping Out Gala  
Stop Animal Cruelty  
Stop Children's Cancer Event  
Stop Dog Fighting  
Stop Mold: National Center for Housing  
Stop the Violence Rally  
Suicide/Warning Signs  
Sulzbacher Center for the Homeless  
Summer Blood Drive  
Summer Safari Nights  
Summerfest 2007  
Sun-Sentinel Children's Fund  
Sun-Sentinel Holiday Show  
Sunshine Laws with Paige Kelton  
Sunshine Week  
Sunstate 3rd Annual Golf  
SunTrust Miles for Moffitt  
Super Bowl of Caring  
Support Local Humane Society  
Support Minority Education  
Survivors of Suicide Loss  
Susan B. Komen Foundation  
Sydney & Berne Davis Art Center  
Take Stock in Children  
Take Stock in Children  
Tampa Bay Black Heritage Festival  
Tampa Bay Buddy Walk  
Tampa Bay Children's Chorus  
Tampa Bay Family Fishing Tournament  
Tampa Theatre Movie Series  
Tarpon Point Marina Concert  
Tarpon Springs Art Festival  
Taste of Pinellas  
Taste of Tampa Bay  
Teal Triumphs Over Ovarian Cancer  
Teddy Bear Round Up  
The Golden Rule

The World Before and After (Meals on Wheels)  
The Zoo Gulf Breeze: Zoolights  
Think Before you Post Cyber Awareness  
Think Pink: FSU Women's B-Ball Game  
Thunder by the Bay  
Thyme for Dinner  
Tots N Teens  
Toys for Tots  
Traffic Response Team  
Troop Greetings  
Turtle Races  
TV Boss Gangs  
TV Boss Slasher  
Twilight Time/Boys & Girls Club of Lee County  
UF Solutions  
UM Festival Miami  
Uncork the Cure  
Underage Drinking  
United Autism Foundation  
United Cerebral Palsy: UCP Telethon  
United Way/ Childhood  
United Way/211 Campaign  
United Way/Healthcare  
United Way/Success by 6  
Uptown Civitan  
Urban Meyer Golf Scramble  
Urban Meyer Golf Scramble  
US Coast Guard Shield of Freedom  
USDA Forest Service and National Associates of State Foresters  
USO: Little Things  
Venice Nokomis Art Festival  
Veteran Support  
Veterans Foundation  
Vino, Java and All That Jazz  
VisionWalk of Southwest Florida  
Vista Fight Poverty  
Vista Fight Poverty  
Walk in Our Shoes  
Waterway Cleanup  
WCJB-TV Blood Drive  
Weather Wise  
Weekly Adopt A Pet  
West Coast Orchid Show  
White Cane Walk/Gainesville  
Wild Fire Prevention  
Wildfire Safety/Ocala National Forest  
WINK News Feeds Families  
Work For Ever Chose to Save  
World Wildlife Ice  
World Wildlife Ice

Wuerffel 4 Kids  
Ya Es Hora Ciudadania  
YBOR Festival of the Moving Image  
YMCA/Local Run  
YMCA: Corporate Cup  
Youth Leadership Media Day  
Zora Festival

## **ATTACHMENT B**

### **Sample of Local Civic Activities in Which Florida Radio Stations Participate**

12 Drinks of Christmas  
A Day for Children  
All Star Dads  
American Cancer Society  
American Heart Association Collier County Walk  
American Heart Association Lee County Walk  
American Heart Association: Big Bend "S.T.A.R.T."  
Amigos Domino Night  
Amigos for Kids Toy Drive  
Amor a la Musica  
Animal Coalition of Tampa  
Annual Cardinal Mooney Shadow Day Program  
Annual Kids with Cancer Radiothon  
Arcadia Rodeo  
Art of the Vine  
Arts for Act Charity Event  
Bartow Halloween Parade  
Bass Pro Shops Canned Food Drive  
Belleza Latina  
Best Buddies Banquet  
Big Bend Crimestoppers: Good Cop  
Black Expo  
Blood Drive  
BMW Drive for a Cure  
Boat-a-Long of Cape Coral  
Bob Dooley Golf Tournament for Children's Cancer  
Boston Red Sox Children's Hospital Charity Golf Tournament  
Bowl for Kids Sake  
Boy Scouts of America Annual Distinguished Citizen Banquet  
Boys & Girls Clubs  
Bravo Ballet  
Breakfast in the Patch  
Breast Cancer Awareness Fundraiser  
Breast Cancer Run  
Brevard County's Strawberry Festival  
Brooksville Christmas Parade  
Broward County Humane Society Walk for the Animals  
Broward Heart Walk  
Bucs Trucks Giveaway  
Butterfly Festival  
Caddy's for a Cure  
Callaway Veteran's Day Parade

Calle Ocho Festival  
Calle Orange  
Cancer Walk at Metro Zoo  
Candidates Forum  
Carnaval Miami  
Carols in the Park  
Celebrate America  
Chefs Gone Wild  
Children's Home Fashion Show  
Children's Miracle Network  
Chocolate Sundae for United Cerebral Palsy  
Christmas Connection 5k Run  
Christmas Connection Toy Drive  
Cinderella Project  
Citrus Festival  
City College of Ft. Lauderdale Tour  
City of Miramar Cultural Trust  
Clay County Fair  
Coalition for the Homeless Golf Challenge  
Code Red  
Community Foundation of Broward  
Concert for a Cure  
Covet House Charity Event  
Cuban Classical Ballet  
Dan Marino's Autism Fundraiser  
Diabetes Walk of Polk County  
Dick Batchelor's Run for the Children  
Dogtoberfest FC: No More Homeless Pets  
Donate Life Day  
Douglas High School Volley Ball Pep Rally  
Drug House Odyssey  
Dunbar Easter Parade  
Eagle-Palooza  
Easter Egg Hunt  
Easter Seals Camp Challenge  
Ebony Events  
Edison College Pops Concert  
Edison Evening of Giving  
Edison Evening of Giving  
E-Fest  
El Cantante Movie Premier  
Election Day Polling Broadcasts  
Emergency Operations Center Open House  
Empty Bowls  
Empty Bowls Food Bank  
Eye on South Florida

Festa Medina  
Festival de Sabores  
Festival Miami  
Festival of Trees  
FFA Beef Classic  
Firefighters Charity Event  
Florida Repertory Theatre  
Food Fight- Second Harvest Food Bank  
Friend to Foster Kids  
Gasparilla Parade  
Get Healthy Florida  
Gift for Teaching  
Gilberto Santa Rosa Concert  
Gingerbread House Fundraiser  
Giving Hunger the Blues  
Golf For Good  
Goodwill Book Works  
Grande Maske  
Greek Festival  
Headdress Ball  
Hearts of Gold Concert  
Heritage Days in Haines City  
Heritage Museum Civil War Re-enactment  
Hialeah Hispanic Heritage Festival  
Hialeah Snow Blast  
Hispanic Chamber of Commerce Banquet  
Hollywood Chamber Media Day  
Hollywood Fitness Expo  
Home Depot's Safety Fair  
Hospice Fashion Show  
Hospice of the Comforter Phone Bank  
Hurricane Seminar  
IKEA Toy Drive  
Imperial Symphony  
International Ballet Festival of Miami  
International Hispanic Theatre Festival  
International Holiday Extravaganza  
Island Jacks Firefighter Fundraiser  
Italian Club Fashion Show  
Jacksonville Art Walk  
Jacksonville Jazz Festival  
Jax Reads!  
Jazz for Justice  
Jazz on the Green  
Jewish Family Services Food Bank  
Johnson & Wales Class & Facility Tour

Jubilee of Broward County  
Keiser University Black History Month Event  
Kidfest  
Kids with Cancer Silent Auction  
Kidz World Expo  
Kiwanis Fireworks Funds  
Kiwanis Pancake Festival  
Kutting for Kids  
La Liga Contra el Cancer  
Ladies Luncheon  
Lady Cougars Baron Collier High Basketball  
Lake Mirror Auto Classic  
Lakeland Pigfest  
Leadership Pinellas  
Leukemia Lymphoma  
Life South Blood Drive  
Lifetime Friends  
Light the Night Luncheon  
Light the Night Walks  
Lions Club Ball  
Love Jen Family Festival  
Luncheon for Leukemia  
Mahatma Scholarship Program  
Maitland Rotary Arts Festival  
Make-A-Wish Luncheon  
Making Strides Against Breast Cancer  
March for Babies  
March of Dimes  
Mayfair on the Lake  
Mayor's Hispanic Heritage Week  
McDonalds Radiothon  
Media Life Line  
Media Life Line Blood Drive  
Memory Walk  
Metropolitan Ministries  
Miami Celebrity 5k  
Miami Dade County Fair & Exposition  
Miami International Book Fair  
Miami International Film Festival  
Mike Alstott Foundation Tournament  
Miramar Halloween Event  
MOC Holiday Boat Parade  
Mothers against Amphetamines  
Mujer, Familia & Hogar Expo  
Multiple Sclerosis Walk for a Cure  
My Cuban Music Concert

NAACP MLK Day Parade  
NAB Service to America:  
Naples Porcelain Artists Annual Show  
News 12's Project Thanksgiving  
Nike 5k  
NMB charity Softball Tournament  
NSU Shark Shuffle  
Oktoberfest  
Operation Backpack  
Operation Backpack for Kids  
Orlando Heart Walk  
Otis Smith Kids Found. Big Cats "Map"  
Outback Bowl Banquet  
Ovarian Cancer Gala  
PAC Season Ticket Drive  
Palatka Blue Crab Fest  
Palm Beach Education Council  
Palm Beach Education Council  
Panama City Christmas Parade  
Pasco High Fashion Show  
Pepsi Stuff the Bus School Supply Drive  
Pets on Parade  
Physician's Health Expo  
Pioneer Days  
Pop a Tab Campaign  
Pops of the Plaza  
Port of Tampa Anchor Ball  
Postcards from Home  
Project Thanksgiving  
Read Across America  
Read Across America  
Read Across America  
Red Ribbon Fun  
Red White and Boom Festival  
Relay for Life  
Relay for Life  
Ride for the Red  
Rock with the Cross  
Rock, Walk & Run  
Ronald McDonald House Charities  
Ronald McDonald House Clambake  
Rotary Club of Brooksville Annual Radiothon  
Safe Halloween at Miromar Outlet  
Safe Night Out  
Salvation Army Angel Tree  
Salvation Army Bell Ringers

Salvation Army's Angel Tree  
Sanford Stroll  
Santa Fe Community College Job Fair  
Santa Paws Walk  
Scripps Spelling Bee  
Sea & Sky Spectacular  
Secret Santa ICAN Toy Collection  
Senior Games  
Senior Orphans Car & Bike Show  
Seniors and Law Together Expo  
Share Your Christmas  
Share-a-Night, Light-a-Light  
Shrimpfest  
Single Greatest Night  
Sister to Sister  
Smoke on the Water  
Snow Central  
Snowfest  
South Beach Comedy Festival  
SPCA Wine Festival  
Spring into Health Fair  
St. Jude Radiothon  
St. Pete 4th of July Celebration  
Steve Otto Chili Cookoff  
Stop Children's Cancer  
Stop Violence Rally  
Strawberry Festival  
Sun State Ten for Teachers  
Sun-N-Fun Fly-In  
Susan G. Komen: Race for the Cure  
SW Florida Golden Halo Awards  
Tampa Bay Buccaneers Fanfest  
Taste of the NFL Food Bank  
Taste of the Suncoast  
Taste of the Town: Fort Myers  
Teacher of the Month  
Teddy Bear Run for Diva Angels  
The Giving Tree  
The Great American Teach-In  
Thomasville Rose Parade  
Three Kings Day Parade  
Tools for School  
Toy Mountain  
Toys for Tots Concert  
Translife Phone Bank  
Tribute to Hector Lavoe

Turkey Trot  
Turkey Trot  
UCP Gala  
Unidos Por la Diabetes  
United Way Downtown Getdown  
Urban League of Broward County  
USF Go Fitness Expo  
Vino, Java and All That Jazz  
Wade Boggs Celebrity Fishing Tournament  
Walk for Awareness  
Wednesday's Child  
Wendy Chioji's Run Around the Universe  
Wham Bam Mammogram  
Wheels of Success Luncheon  
White Cane Walk  
Willy Chirino Concert  
Winterfest Boat Parade  
Winterfest Family Fun Day  
Women in Distress Walk  
Woodbine Crawfish Fest  
World AIDS Day  
Youth Achievement Weekend  
Zora