

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)
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Broadcast Localism) MB Docket No. 04-233
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To: Office of the Secretary
Attn: The Commission

COMMENTS

I Robert D. Breck Jr, CEO and General Manager of Nevada County Broadcasters, Inc, the licensee of KNCO Grass Valley, CA, KNCO-FM Grass Valley, CA and KUBA Yuba City, CA, pursuant to *Report on Broadcast Localism and Notice of Proposed Rulemaking*, FCC 08-218, MB Docket No. 04-233, released January 24, 2008, hereby submits my comments in this proceeding regarding the FCC's several proposed rule changes designed to enhance broadcast localism and diversity.

Community Advisory Board:

This proposed Community Advisory Board is too hard to define, regulate and maintain to make it a productive addition to broadcasters localism efforts. The reality is that the smaller the market, the more likely it is that the broadcaster already has a solid relationship with local government, law enforcement and community organizations. Broadcasters are currently required to determine important local issues, address them with local programming and place the results in their public file. Even in the smallest communities of license, local organizations

and government offices make this information easily accessible by posting local issues being considered on their websites.

Since commercial radio stations are highly targeted and have deeper personal relationships with their audiences than other mediums, there's a huge benefit to the listener when targeted radio stations cater to the information needs of the demographics they're serving. This is significantly different than non commercial stations that are required to have Community Advisory Boards to insure diversity of programming on one single station.

I suggest that at most, commercial broadcasters should be required to list their sources and research methodology for determining issues they'll address with local programming and place it in their public file.

Remote Station Operation:

Having a physical presence at a radio station does not insure more service to the community. At the thousands of stations currently doing an excellent job covering their communities, most have several hours of unattended and/or automated operation allowing their personnel to have more face time in their community. We have many instances that by using automation, a pre-recorded local program is running on the air while the reporter who produced the program is out gathering more community information. And with modern technology allowing each station to expand its "studio" beyond the physical mailing address, this proposal is simply outdated.

I would propose that stations be required to have a local coverage plan that would insure that local emergency information could get on the air in a timely manner 24/7 no matter what technology is used. This plan could be available in the public file and subject to the normal FCC inspection guidelines already in place.

Main Studio Rule:

The proposal to require broadcasters to have their main studio located in their city of license is too limiting and would do the opposite of what is intended at many stations. With the diversity of local, suburban and metropolitan population centers, economical space available and geographic considerations, this proposed main studio rule would be an economic and technical disaster in some communities.

From a technical standpoint, in our mountainous market, studio to transmitter telephone and internet service is limited making a microwave link the best option.

Only 10% of the available office space in our community of license fits our line of site requirements. A few miles out of our community of license but still within our primary service contour, there's a community in which 90% of the available office space fits our line of site needs. This is just one example of the limitations that will pop up as the result of a requirement to locate studios in the city of license. Once again, the smaller the market, the larger the penalty for a one size fits all rule.

I would suggest that with the local coverage plan mentioned above, there would be no need to adopt costly new main studio rules that would put an unnecessary and unintended burden upon broadcasters

AM use of FM Translators:

I urge the FCC to accept this long overdue proposal allowing AM stations to rebroadcast their limited or non-existent signals on FM translators. Because of overcrowding on the AM dial, excessive interference from electronic devices, limited coverage and the inferior audio quality on AM, the vast majority of listeners depend on FM stations for their information and entertainment. Allowing AM on FM would increase the availability of more local information to thousands if not millions of listeners.

Voice Tracking:

Voice Tracking has no relationship to localization. I operate two stations that use voice tracking technology and the voiced tracked shifts are often more local as the announcers are focused on filling their tracks with local information. Voice tracking also doesn't limit a stations ability to go live when necessary. Pre-recorded content has always been a part of radio and television broadcasting and I urge the FCC to **not** adopt any new rules that would limit its usage.

National Playlists:

I urge the FCC to **not** consider the music of local artists as local content. Each broadcaster determines the content and quality threshold of the music on their station in an effort to maximize their audience and the number of people they serve. In other words, requiring a station to play poor quality local music at the expense of driving away listeners who might otherwise stay to hear local news and public service announcements is not a good idea. Also, there are thousands of popular national artists that could be claimed as local artists by stations in their hometowns. This would create undue pressure on some stations while letting others off the hook.

In conclusion, I submit that the above comments should be taken into consideration by the Commission in issuing its decision in the above-referenced proceeding.

Respectfully submitted,

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