

February 26, 2008

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Received & Inspected

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RE: MM Docket No. 04-233

WUWM-FM is licensed to the University of Wisconsin Board of Regents and operated by the University of Wisconsin – Milwaukee. Each week our programming reaches more than 80,000 listeners throughout Southeastern Wisconsin.

We can appreciate the Commission's interest in directing stations to be more responsive to the needs of their local communities. It is our position that WUWM, and many other non-commercial radio stations around the country, see this as a core part of our mission. We remain concerned, however, that the proposed language will have unintended consequences that will actually limit our efforts in the future.

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COMMUNITY INVOLVEMENT

WUWM has the largest news staff of any radio station (commercial or non-commercial) in Milwaukee. In addition, we produce a daily news magazine, which addresses issues and ideas that are of importance to residents of our area. In recent weeks the program has explored research on the effectiveness of the voucher and school choice program in Milwaukee. We've also broadcast extended interviews with candidates for local and statewide office. Local musicians have performed on the program and local authors have discussed their works.

We have forged partnerships with many Milwaukee area arts organizations, area newspapers and magazines. Reporters from the Milwaukee Journal Sentinel and Milwaukee Magazine offer background on the stories that they have written. For example, the Journal Sentinel's Washington reporter, who has been on the campaign trail with the presidential candidates, has become a regular contributor on our news magazine. We help promote and cosponsor the events of area arts groups.

Periodically, WUWM takes an extensive look at an important community issue and produces in-depth reports on the subject, documentaries and public forums. "Project Milwaukee" recently examined the economic growth of the region and will soon focus on crime and violence (See www.wuwm.com/projectmilwaukee)

WUWM has also commissioned public opinion research, "The Milwaukee Poll," which tracks the views of area residents. Our journalists use the results to develop in-depth reports around these subjects. Recent polls have explored reaction to the budget shortfalls of state government and global warming. The results of these polls are distributed to other news media. The results and the companion reporting is archived on WUWM's website:

(<http://www.wuwm.com/programs/index.php?page=polls>)

We have recently relaunched our website (www.wuwm.com) so that it can become a resource for the community. Now more than a simple way of promoting our programming, the site is the home for archives of our journalism as well as in studio performances. Our journalists are also posting background material for their stories as well as audio that has not been broadcast by the station.

The UW Board of Regents is an 18-member board established under Wisconsin State Statutes. This diverse group represents many sectors of the state's population and geography. In addition, WUWM already has a 15 member Community Advisory Board that advises management on programming, fund raising and other policy issues. Our journalists regularly meet with this group to compile a list of issues, which deserve coverage. While we have recruited

members for this group from various sectors of our coverage area, we have learned that the most active members are those individuals who are already listeners and want to see the station improve. Whenever we have recruited individuals who represent community groups, but do not have a vested interest in our programming, they tend to be less concerned about improving the programming on WUWM.

In addition, our management team is involved with other community groups as well. As the general manager of WUWM, I am a member of key community groups such as the Rotary Club of Milwaukee, and have served as an elected member to a suburban school board. Our staff members speak to community and school groups.

WUWM is not alone in these types of programs. I suspect that most CPB qualified public radio stations have similar initiatives in place.

REMOTE STATION OPERATIONS

We are particularly concerned about proposed regulations regarding the prohibition of automated broadcast transmissions.

WUWM could not afford to be on the air 24 hours per day and 7 days per week if we could not automate non-peak hours. Given our limited budget, we choose to

hire staff to produce content, rather than have them monitor a control board during the overnight and weekend hours. We have taken steps to make sure that the station is monitored so we know if there is a problem.

If WUWM had to sign off the air during the overnight hours, for example, we would no longer be broadcasting EAS warnings regarding weather or other emergencies.

We would also have to reduce the number of journalists, so that we could employ board operators to monitor the controls in the evening and on weekends.

ENHANCED DISCLOSURE FORMS

WUWM believes in disclosing important information about our operations to the community. Our website includes information on our financial performance, hiring practices and programming. But due to staffing requirements, it would be extremely difficult to tabulate our programming efforts and report them as proposed in FCC regulations.

If such regulations would be adopted, we would have to take existing staff away from their duties in producing content and reassign them to complete the required forms. As a result, much of the journalism, which is described in this

filing, would no longer be possible, as we would be diverting substantial resources to the compliance of the proposed regulations.

FINALLY.....

We request that the FCC considers balancing new regulations against the ability of broadcasters – *particularly non-commercial broadcasters* – to meet these new codes against their existing efforts to create meaningful programming.

The media landscape has changed and we recognize the concern of the Commission and others to remind broadcasters of their obligations to their local communities.

As I have tried to illustrate, WUWM has been successful in large part because we already serve the community. While much of our programming is from National Public Radio and other sources, we are increasingly recognized by listeners for the local programming we broadcast.

We know that most of our peer public radio stations take the same approach.

We therefore request that the Commission consider the special circumstances of non-commercial public broadcasting in adopting any new regulations.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Dave Edwards". The signature is written in a cursive, flowing style.

Dave Edwards
Director / General Manager

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