

APR 2 - 2008

WPEC • Phone (561) 844-1212 • Fax (561) 842-1212 • Toll Free (800) 310-WPEC

FCC Mail Room

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April 1, 2008

Re: Comment in Response to Localism Notice of Proposed
 Rulemaking MB Document # 04-233

To Whom It May Concern:

WPEC is the CBS affiliate serving the West Palm Beach-Ft. Pierce-Boca Raton television market, the nation's 38th largest. Our analog and digital stations serve an average weekly come audience of about 581,000 households in five counties comprising almost five-thousand square miles of land in Palm Beach, Martin, St. Lucie, Indian River and Okeechobee.

WPEC produces 48 hours of local news each week -- more than any other station in the market. To cover that much news means the station must be intimately wired to its community: From local officials and law enforcement agencies, social service agencies who deal with community issues and special interest groups, and ordinary citizens to need the power of the press to bring attention to their individual situations.

WPEC's newsroom is staffed by veteran reporters and managers, several with 20+ years of covering our local community which brings context and texture to their stories. In addition to the main studio, WPEC operates two live remote bureaus in the northern and southern portions of its coverage area, staffed by full-time journalists who are required to live in those geographic areas.

To cover the news in such a large geographic area requires a significant investment in technology. WPEC was the first station in the market with a full-time live television news helicopter so it can cover the news wherever it happens. It was the first station in the market with a live satellite news gathering truck and maintains a fleet of remote news vehicles. The station is also enhancing its live-to-the-Web reporting capabilities with digital correspondents equipped with laptops, digital cameras and field editing equipment.

Beyond its commitment to local news, WPEC is committed to the betterment of the community through staff and management level participation in important not-for-profit boards and organizations, community projects, sponsorships and public service, including United Way of Palm Beach County, Gulfstream Goodwill Industries, the March of Dimes, Big Brothers-Big Sisters, Kravis Center for the Performing Arts, Children's Miracle Network, Urban League of Palm Beach County and many others.

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In 2007 the station donated over a half-million dollars of airtime to support important local and regional efforts such as school dropout prevention, United Way, foreclosure prevention, healthy babies, Habitat for Humanity, Al-Anon, Literacy, Department of Emergency Management Family Disaster Planning and others.

In November 2007 WPEC completed its 17th annual NEWS 12's Project Thanksgiving™ campaign to provide holiday turkeys to families in need throughout its five-county coverage area. The 2007 campaign raised \$134,711, bringing the 17-year total to \$1,762,636. 100% of the money raised by Project Thanksgiving is used to purchase holiday food – all overhead and administrative costs are covered by WPEC and its commercial partners United Way of Palm Beach County, Wachovia Bank, Winn Dixie and Palm Beach Kennel Club. The commercial sponsors are not required to purchase airtime in support of the program or to participate.

After the disastrous hurricanes Frances and Jeanne WPEC was honored by the National Association of Broadcasters with its "Service to America: Friend in Need Award 2006." The award was presented in recognition of over 100 hours of continuous, commercial free coverage of the devastating storms.

Other community action projects which are regularly featured in our newscasts are "Making a Difference," a segment highlighting the achievements of local members of our community who go "above and beyond" to help the community's less fortunate; "Fugitive Files," where we work with local law enforcement and viewers to get dangerous felons off our local streets; "Clean it Up," a local grassroots effort to remove litter and debris covering many of our local neighborhoods.

None of this community news, information and service happens in a vacuum. It is the result of daily contact and interaction of the dedicated employees of WPEC and the community in which they live.

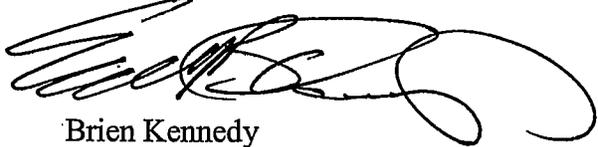
It happens because we at WPEC understand that is the difference between local television stations and the national networks and cable channels. Our very future as a business depends on our ability to "super-serve" our local audience with information that is unique from the national media and custom to the needs of our local audience.

To accomplish that is a huge task – one to which we are absolutely dedicated but one that could be severely impaired if it is bogged down in bureaucratic paperwork and reporting.

Local broadcasters who serve their local communities in the ways we have described here at WPEC will be rewarded with increased viewing and loyalty from our local audience and from commerce with our local businesses. Those broadcasters who choose to ignore their local communities are destined to fade away. The marketplace is an exceptional winner.

Under current Federal Communications Commission mandates local broadcasters are already required to provide key programs and coverage for community service and document that coverage in our public file. The appropriate rules are already in place. We respectfully request that you allow us to continue our mission of service to our local communities without the burden of more rules and regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Brien Kennedy", with a large, stylized flourish at the end.

Brien Kennedy
Executive Vice President and General Manager
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