

Greater Media participated, along with 43 other broadcasting organizations representing more than 600 radio and television stations, in the filing of joint comments in response to the NPRM.² These joint comments demonstrated how the present proposals would have a far reaching, potentially debilitating impact on the broadcasting industry, while engendering few public benefits. In these Reply Comments, Greater Media seeks to enhance the already extensive record, compiled during the Notice of Inquiry stage of this proceeding, of the extraordinary contributions broadcasters make to their local communities. Described herein are concrete, representative examples of *significant* local community involvement by Greater Media's stations, including the broadcasting of "programming that is responsive to the needs and interests of [the stations'] communities of license."³ These examples augment numerous comments submitted by other broadcasters,⁴ that when viewed in their entirety, present an evidentiary record replete with community-responsive initiatives and programming, and belie the unsubstantiated notion that broadcasters are somehow uninvolved in their communities. Greater Media encourages the Commission to focus on the broadcasting industry's documented, demonstrated commitments to localism, and to abandon its quest to re-impose outmoded, unnecessary regulations from a bygone era.⁵

² See Joint Comments of Broadcast Licensees, MB Docket No. 04-233 (April 28, 2008).

³ *In the matter of Broadcast Localism*, Notice of Inquiry, 19 FCC Rcd 12425 (2004).

⁴ See, e.g., Comments of CBS Corporation, MB Docket No. 04-233 (Apr. 28, 2008); Comments of Clear Channel Communications, Inc., MB Docket No. 04-233 (Apr. 28, 2008); Comments of Cox Broadcasting Inc. and Cox Radio, Inc., MB Docket No. 04-233 (Apr. 28, 2008); Comments of Sinclair Broadcast Group, Inc., MB Docket No. 04-233 (Apr. 28, 2008).

⁵ Greater Media wholeheartedly concurs that, "[g]iven th[e] undoubted record of voluntary community service [by broadcasters], there would seem to be little need for an extensive re-regulation of broadcasting." Comments of CBS Corporation, MB Docket No. 04-233, at 2 (April 28, 2008).

Following are representative examples of numerous initiatives undertaken by Greater Media's stations.

DETROIT

All three Greater Media Detroit stations participate in an internally-developed program called Moving Michigan Forward, an educational, entertaining online and broadcast program focusing on the Alternative Energy (AE) movement and its economic, social and environmental impact on the region. Each of the stations broadcasts a weekly morning drive during which a variety of AE topics are discussed with key personalities, and hosts an online forum, with the goal of educating residents about alternative energy and other "green" topics.

1. WCSX(FM)

WCSX(FM) exemplifies that a radio station can have a narrow musical format, yet provide programming and participate in events that demonstrate a firm commitment to the community. WCSX devotes two hours each Sunday to public affairs programming, featuring interviews with local leaders who work to improve community and political life in Detroit, an analysis of how news is presented, and commentary on challenging problems in the community. The station also produces and airs numerous public service announcements, averaging *over 500 such announcements per calendar quarter*.

WCSX is involved, on a regular, ongoing basis, in community-based fundraising projects, including those that involve significant amounts of programming focused on community needs. For example, *for 14 years*, the station's morning co-hosts have broadcast fundraisers for the Children's Leukemia Foundation of Michigan; the 2007 event raised \$155,000, bringing the radiothon total to *almost \$3 million*. The station supports Habitat For Humanity of Oakland County, which builds new homes for community residents in need; in

2007 alone, over \$75,000 was raised in cash and materials, and the station helped recruit hundreds of volunteer hours for a 10-day “blitz build” of homes. Smaller scale community-responsive events have included daylong pet adoptions held in conjunction with local animal adoption organizations, and support for the St. Andrews Society of Detroit, a benevolent organization dedicated to preserving the heritage of Michigan’s Scottish immigrant community.

WCSX sponsors numerous events in the Detroit area, including “WinterBlast,” a cultural event in downtown Detroit that includes local bands and entertainment, and “City Fest,” a five-day outdoor food and entertainment street festival in the city’s historic New Center.

2. WRIF(FM)

WRIF(FM) demonstrates commitment to the local community through public affairs programming that addresses community issues, and through organization and sponsorship of local events. WRIF also promotes and helps develop local musicians.

On a daily basis, WRIF produces news broadcasts that focus on topics pertinent to the Detroit area. On Sunday evenings, it devotes two hours to “Night Call,” a public affairs program featuring political commentary and listener call-in, and to discussion of local issues and charitable events. These programs are also aired on WRIF’s second digital audio channel at different times. The station airs live public service announcements in most dayparts. It conducts focus groups with listeners to ascertain listener preferences for music, promotions, and personalities.

To support the local music scene, WRIF hosts “Motor City Riffs,” a two-hour program, each Sunday evening. The program exclusively features local, unsigned musicians, giving them a platform to discuss their music, projects, and show dates. The station also holds “opening band” contests, providing local bands with greater exposure to the station’s listeners and the

broader community, and resulting in one band becoming an opening act for a national artist. At community events, WRIF generally hires local bands to provide entertainment, thus providing good opportunities for promotion and local exposure of local musical artists. WRIF's second digital audio channel plays a mix of music, approximately 25% of which is provided by local musicians, and has numerous programs throughout the week that focus more in-depth on a local music and musicians.

WRIF works with local charities to raise awareness and funds. In July of 2007, the station helped raise \$31,000 to promote research into cures for muscular dystrophy and cancer. It also helped raise over \$40,000 for two charities, one of which helps local cancer patients in financial trouble, and the second of which is the local branch of the Salvation Army.

3. WMGC-FM

WMGC-FM solicits, produces, and broadcasts announcements promoting community events, awareness, and fundraisers. From January 1, 2007 through March 31, 2008, the station broadcast *2,061 such announcements*, supporting events such as free art programs at the Detroit Festival of Art and free health awareness programs, and fundraisers for the community's homeless children and a local reading and language arts center.

WMGC-FM is active in raising hundreds of thousands of dollars for local charities, often in combination with the broadcast of community-responsive programming. For example, in February 2007, the station's morning show devoted its time to a live broadcast to benefit the Capuchin Soup Kitchen, a local charitable organization assisting the needy. The broadcast raised \$4,000 and *two truckloads* of clothing. From May 7 through May 11, 2007, the station conducted live broadcasts each morning from various local hospitals, honoring local employees in the nursing field, and bringing attention to the services they provide the community on a daily

basis. In June 2007, it sponsored a “Walk For Hope” for the Children’s Leukemia Foundation of Michigan. The event raised \$70,000. In September 2007, the station formed and sponsored a team that helped raise *over \$450,000* as part of the Michigan Breast Cancer 3-Day Event. And in November 2007, WMGC coordinated with a local automobile dealership to encourage food, clothing, and cash donations for the Capuchin Soup Kitchen of Detroit, which resulted in total donations worth *over \$132,000*.

CHARLOTTE

1. WLNK(FM)

The success of Charlotte’s WLNK(FM) is directly related to its strong commitment to and roots in the Charlotte community. In 2007 alone, the station helped raise millions of dollars for charities, broadcast hundreds of hours of community-responsive programming, and provided support for dozens of events and charities that inspire and assist the Charlotte community.

In addition to raising \$1.25 million via its syndicated morning program to support less fortunate children in a third-world country, the station supported over a dozen local charities with on-air announcements and online placements. WLNK sponsored and contributed over 280 hours of staff time to the design, execution, and management of the “2007 Easter Eggstravaganza,” a community event attended by more than 5,000 people. WLNK also sponsored “Matthews Alive,” to which it devoted over 235 hours of staff support; the event provides a community venue for nonprofit organizations to raise funds for their groups.

In addition to broadcasting from community events, WLNK devotes significant time to airing programming that addresses issues of importance to the Charlotte area. For three hours each Sunday, the station broadcasts “The Satisfied Life,” which focuses on issues such as relationships, parenting, health and finances. On Saturday mornings, it broadcasts the “Link

Workout Show,” a program that addresses health issues, and “Why Weight,” a program that encourages weight loss through better health habits. WLNK broadcasts a three-minute newscast focusing on local news, every thirty minutes, on weekday mornings. Every afternoon from 4:25 to 5:00, the station airs a daily news segment that includes significant treatment of local news and events.

2. WBT(AM/FM)

WBT(AM/FM) provides continuous coverage of news, sports, politics, and weather, and produces much of its content locally, including the three-minute newscasts that air twice hourly during drive-times. “Charlotte’s Morning News” is a four-hour news and informational program that airs each weekday, and features a large amount of local news coverage. The station also airs “What’s Happening,” thirty-second public service announcements focusing on local events and issues of non-profit organizations. In 2007, it broadcast *1,077 such announcements*.

WBT has raised hundreds of thousands of dollars for charities in the community, including \$20,000 for the local Kids First Christmas Party for underprivileged children. It has supported the Charlotte Mecklenburg Police Department’s events for Special Olympics in North Carolina, helping to raise \$47,000.

WBT also organizes and sponsors community-related events around major holidays, in an effort to provide safe, family-friendly atmospheres. For example, it contributed 178 staff hours in 2007 toward organizing and sponsoring the “Sky Show,” a simultaneous live broadcast of classic radio recordings with holiday fireworks. It contributed over 700 staff hours to the November-December 2007 “Holiday on Ice,” which provided over 20,000 people an opportunity to skate amidst special events such as Veterans Night and Home School Day, while generating significant donations of canned foods for needy residents.

PHILADELPHIA

1. WMGK(FM)

Almost all of WMGK(FM)'s programming is originated live and in the station's studio, and all traffic and news reports are live and local. The station makes weekly visits into the community to broadcast live from an area of the city or from a suburb, to promote the involvement and interaction of the station in the community. It also provides live broadcasts from local sporting events and concerts.

WMGK's local commitment extends to raising and generating hundreds of thousands of dollars in financial support for community-based charities. Every year, the station conducts a radiothon to benefit Philadelphia-area veterans. In 2007 alone, this event raised *over \$120,000*. The station organizes and supports art shows in the community focusing on the development of rock music and musicians; during the past two years, these shows generated over \$25,000 in support for the Elizabeth Glazer Pediatric AIDS Fund and the Philadelphia Soul Moving Experience. During the winter holiday season, WMGK organizes food and monetary donations to support area needy residents; in 2007, it collected 7,700 turkeys for the hungry, and \$30,000 in toys and cash donations for needy children.

WMGK is also active in the solicitation, production, and placement of public service announcements for numerous charities and non-profit organizations in the Philadelphia area. It donates approximately *\$1,000,000 worth of air time each year* to public service announcements, and space on its website valued at *over \$250,000 annually*. In addition, the station encourages its on-air personalities to give air time to local causes in which they are involved; such on-air promotion is valued conservatively at over \$150,000 annually.

2. WBEN-FM

WBEN-FM regularly participates in, promotes, and sponsors numerous charitable activities in the community, including:

- Parkway Run/Walk for Children's Hospital of Philadelphia
- American Diabetes Association's Step-Up Walk
- The March of Dimes Walk
- The Crohn's and Colitis Foundation of America Guts and Glory 5K Run.

WBEN-FM regularly donates items to an average of twenty charities each month, generally for fundraising activities. The station posts an average of 30 community-related announcements per month on its website. It broadcasts and promotes a weekly community affairs program entitled "Radio Health Journal," which examines health issues and their interaction with economics, consumerism, education, substance abuse, poverty, and food safety.

3. WPEN(AM)

WPEN(AM) broadcasts a weekly two-hour program that focuses on, supports, and promotes community-based charities, and events benefiting them. The host's own foundation, "One Child Saved," which supports underprivileged children, is featured each week. WPEN also broadcasts approximately five public service announcements daily, and encourages its on-air guests (who are mostly sports figures) to discuss their involvement in local charities.

The station participates in and supports numerous local charitable events, including:

- The Brian Dawkins Golf Tournament, benefiting burn prevention
- The Jim Furyk Invitational Golf Tournament, which has raised over \$950,000 for numerous charities, including the Boys & Girls Clubs of Philadelphia
- The Crohn's and Colitis Foundation of America charity run

- Coaches Versus Cancer events.

4. WMMR(FM)

WMMR(FM) conducts several lengthy on-air broadcasts each year to promote community involvement in local charities. Each year, the Preston & Steve morning show hosts its “Camp Out For Hunger,” during which the two morning hosts live in a trailer for one week in December to encourage donations of food for the Greater Philadelphia Food Bank. The show awards prizes to individuals and groups that donate the most food. Each of the last three years shattered the previous year’s record collection, with 87.4 tons of food in 2005, 151 tons in 2006, and 232 tons in 2007 (as well as \$27,000 in cash), making the event the largest single location food drive in the United States. In 2007, the station also hosted and promoted a week-long coat drive and conducted a 12-hour long blood drive broadcast, resulting in the donation of over 700 pints of blood. It broadcast, for one entire week, announcements in support of a local organization to assist the homeless. It assisted in raising, in one night, \$25,000 to support the family of a slain police officer.

WMMR is committed to supporting local musicians, and plays music by local artists each week during drive times. It supports and assists in the opening of national musical events by local talent.

5. WJJZ(FM)

WJJZ(FM) is committed to informing its listeners about community-based projects and events. The station also sponsors and/or supports numerous local events. In January 2008, WJJZ formed a partnership with the Philadelphia Soul arena football team and the National Liberty Museum to help further its “Diversity and Inclusion Initiative,” including a program called “P.E.A.C.E. Through Music” (Providing Educational Access to Communities

Everywhere), which is designed to promote diversity through education about conflict resolution and the understanding and acceptance of other cultures. Elements of the P.E.A.C.E. initiative include a student essay contest culminating in the award of scholarships to local students, educational forums at the National Liberty Museum featuring the station's program director and mid-day personality, and an on-air awareness campaign and online resource center to promote all of the program's themes.

WJJZ schedules at least one public service announcement in each daypart, seven days per week. The station has made donations of money, airtime, and internet space to the following local charitable organizations:

- The Grover Washington, Jr. "Protect the Dream" Foundation
- March of Dimes
- Local Ronald McDonald House
- Local chapters of the Alzheimer's Association and the National Ovarian Cancer Coalition.

BOSTON

Greater Media's stations in the Boston market demonstrate significant commitment to their communities and to providing community-responsive programming. For example, **WTKK(FM)**, a news/talk station, hosts monthly call-in shows with local governmental officials, such as Boston's mayor and Massachusetts' governor. WTKK is providing in-depth coverage of local (and national) elections in 2008. All of the station's weekday talk programs from 9:00 a.m. to 10:00 p.m. are locally produced, feature local personalities, and focus on issues of particular importance to the local listening area. The station makes a conscious effort to promote and

support local charities such as the Norman Knight Hyperbaric Medicine Center, the Genesis Fund, and Camp Harborview.

WKLB-FM produces and broadcasts “Greater Boston Today,” a general-interest public service program that focuses on betterment of the community. It promotes performances by local musicians and bands at area nightclubs, and assists in conducting talent contests for local musicians. WKLB conducts an annual radiothon to solicit funds for St. Jude’s Children’s Research Hospital; since its inception, the radiothon has raised *millions of dollars* for the charity. The station is also active in community events such as Ovarions for a Cure, Positive Spin for ALS, and the MS Walk. In 2007, the station led a five-station radiothon to benefit Camp Harborview, a new facility in Boston designed to remove children from violent environments and provide them a safe camp environment for one week during the summer.

WBOS(FM) has, for 14 straight years, partnered with the Commonwealth of Massachusetts to present “Earth Day – Earthfest,” a full day of music featuring local and national artists and a family stage, for approximately 100,000 local residents. Nonprofit organizations from the community attend and participate in the event, which focuses on environmental and global issues. The station has produced a music CD featuring artists who have performed live at station events, thereby promoting local musical artists; proceeds from the CD support Camp Harborview. WBOS has hosted and partnered with the local Susan G. Komen Race for the Cure, the Pan Mass Challenge, and the Charity Walk for Multiple Sclerosis. It regularly supports the efforts of the Greater Boston Food Bank. WBOS produces a public service program each Sunday morning that focuses on health care, child services, education, and other community issues.

WROR-FM maintains deep connections with the Boston-area community, partnering with various local charities on a regular basis, and helping to raise funds. The station broadcasts 30-40 public service announcements each week for charities and nonprofits; it writes and produces many of these specifically for local organizations and causes. WROR interviews the mayor of Boston, as an on-air guest, approximately 10-12 times per year, allowing frank discussions of community-related issues and events. The station encourages its on-air talents to become involved in charity functions and to relay details of the charities' events to listeners, thereby encouraging listener participation in community organizations. Approximately 12-15 times per year, WROR collects and donates goods and funds to assist local charities.

WMJX(FM) is the originator of "Exceptional Women," a one-hour radio program that airs every Sunday and provides radio portraits of inspiring women. Created by station employees in 1992 and co-hosted by WMJX personalities, "Exceptional Women" has won 25 awards, including 13 Gracie Allen Awards from the American Women in Radio & Television (AWRT), seven Boston Achievement in Radio Awards, the "Star Award" from the Massachusetts Broadcaster's Association and the Communicator Awards' 2002, 2003, 2004 and 2005 Crystal Award of Excellence. The station also hosts an annual awards luncheon to recognize women whose lives are an inspiration to others. Working with local sponsors, the station makes a donation to a local breast cancer organization each year in honor of the program.

MORRISTOWN, NEW JERSEY

Stations **WDHA-FM** and **WMTR(AM)** maintain close connections with their local communities, and provide significant quantities of locally responsive programming. Each weeknight, WDHA-FM features "Homegrown Spotlight;" local bands submit their music, and

the station features a different local artist on-air every night. WMTR broadcasts its “Community Notebook” each weekday during afternoon drive time; the feature focuses on and promotes non-profit community news and events. WMTR broadcasts a talk show each weekend entitled “Your New Jersey Connection,” focusing on community events and issues.

Both stations provide space on their websites for the posting of community non-profit events and issues. The stations regularly participate in community fundraising events such as the St. Baldrick’s Foundation Cancer Fundraiser, the Habitat for Humanity Re-Store grand opening, and the local March of Dimes Walk for Babies.

CONCLUSION

The multiple, impressive examples set forth herein demonstrate the unwavering commitment of broadcasters such as Greater Media to their local communities, and the significant staff time and financial resources broadcasters devote to support locally responsive programming, and community organizations and events. In light of this demonstrated commitment to local communities and citizens, Greater Media respectfully encourages the Commission to reject as unnecessary the proposals presented the NPRM.

EXHIBIT A

Greater Media, Inc. is the parent of the following licensee subsidiaries:

Charles River Broadcasting Company, licensee of:

WKLB-FM, Waltham, MA

Greater Boston Radio, Inc., licensee of:

WROR-FM, Framingham, MA
WBOS(FM), Brookline, MA
WMJX(FM), Boston, MA
WTKK(FM), Boston, MA
WMMR(FM), Philadelphia, PA
WCSX(FM), Birmingham, MI
WRIF(FM), Detroit, MI
WMGC-FM, Detroit, MI

Greater Philadelphia Radio, Inc., licensee of:

WPEN(AM), Philadelphia, PA
WBEN-FM, Philadelphia, PA
WMGK(FM), Philadelphia, PA
WJJZ(FM), Burlington, NJ

Jersey Shore Broadcasting Corporation, licensee of:

WJRZ(FM), Manahawkin, NJ

The Sentinel Publishing Co., licensee of:

WRAT(FM), Point Pleasant, NJ
WCTC(AM), New Brunswick, NJ
WMGQ(FM), New Brunswick, NJ
WWTR(AM), Bridgewater, NJ
WMTR(AM), Morristown, NJ
WDHA-FM, Dover, NJ

Greater Media of Charlotte Inc., licensee of:

WBT(AM), Charlotte, NC

WLNK(FM), Charlotte, NC

WBT-FM, Chester, SC