

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Promoting Diversification)	FCC Docket No. 07-294
Of Ownership in Broadcast Services)	
)	
2006 Quadrennial Regulatory Review –)	FCC Docket No. 06-121
Review of the Commission’s Broadcast)	
Ownership Rules and Other Rules)	
Adopted Pursuant to Section 202 of the)	
Telecommunications Act of 1996)	
)	
2002 Biennial Regulatory Review –)	FCC Docket No. 02-277
Review of the Commission’s Broadcast)	
Ownership Rules and Other Rules)	
Adopted Pursuant to Section 202 of the)	
Telecommunications Act of 1996)	
)	
Cross-Ownership of Broadcast Stations)	MM Docket No. 01-235
and)	
Newspapers)	MM Docket No. 01-317
)	
Rules and Policies Concerning Multiple)	
Ownership of Radio Broadcast Stations)	
in Local Markets)	MM Docket No. 00-244
)	
Definition of Radio Markets)	MM Docket No. 04-228
)	
Ways to Further Section 257 Mandate)	
and to Build on Earlier Studies)	

Comments of Barbara Ciric

In its NPR the Commission seeks comments on its authority to adopt rules requiring must-carry of Class A television stations to promote programming diversity and localism.

I am a partner in WPSJ-LP, a Class A station licensed to Hammonton, New Jersey. I strongly support the comments of the Community Broadcasters Association and must-carry for Class A stations.

WPSJ-LP has been on the air since 1986 and since then has had no cable carriage except that which we paid for under the leased access rules.

The Class A service provides diversity in ownership. It has the highest percentage of minority owners of any broadcast service. Class A stations also provide significant local programming, in far excess of the required weekly 3 hours. This service is in place and operating. The Commission should address the inequities in the regulations affecting Class A before establishing any new service.

Mandatory cable carriage for Class A stations is vital to ensure the continuation of the local programming and diversity of ownership brought to the industry by the Class A service.

As a woman owner of a broadcast station that provides innovative and interactive programming including programming directed to women's health problems, I presumed that the local cable company would be delighted to allow their subscribers to view my stations.

This has not been the case.

The cable operator does not return my telephone calls and responses to my emails are rare.

Cable and satellite act as a bottleneck or gatekeeper to television viewers in the WPSJ coverage area. It is estimated that 94% of the homes in our area receive cable or satellite.

Those 94% cannot view our local programming unless we purchase leased access time. This is an additional cost on top of our production and transmission costs which our competitors do not have to pay.

Paying for cable carriage handicaps our station and unfairly restricts the types of programming we can do. We must do programs that are targeted to a broad audience so we can attract advertisers. We cannot do programs that reach out to smaller audiences because there is not enough advertising revenue to support the leased access fees. For example, we have a strong desire to produce a series of programs for teenage mothers in Camden, Atlantic City and Cumberland County, NJ. These areas are among the highest in the nation for teenage pregnancy rates and school dropout rates.

We wanted to help teenagers by educating them on this issue and showing them the resources available to stay in school. We could not find advertisers who would pay enough to cover the costs of production and leased access.

We cannot subsidize this type of programming because our operating margin is so thin from paying for cable leased access.

Mandatory cable carriage would enable us to subsidize local programming targeted to smaller groups of underprivileged populace.

I urge you to adopt the proposal of the Community Broadcasters Association (CBA)¹ to add Class A stations to the Table of Allotments.

It is consistent with the existing statutory framework and is within the regulatory authority of the Commission.

This will promote diversity in ownership, promote local programming and ensure viability of the Class A service.

Respectfully submitted,

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¹ See CBA Comments, pg. 3-5