

Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of )  
 )  
The Future of Media and Information ) GN Docket No. 10-25  
Needs of Communities in a Digital Age )

**COMMENTS**  
**ON BEHALF OF**  
**COHEN, DIPPELL AND EVERIST, P.C.**

The following comments are submitted on behalf of Cohen, Dippell and Everist, P.C. (“CDE”) and is in response to the Public Notice, DA 10-207, released February 18, 2010. CDE and its predecessors have practiced before the FCC for over 70 years in broadcast and telecommunications matters. The firm or its predecessors have been located in Washington, DC since 1937 and performed professional consulting engineering services to the communications industry.

Based on our knowledge, licensees are performing public interest by operating a broadcast station in this harsh economic climate. To apply possible additional burdens at renewal time could be counter-productive. One only needs to examine the fate, decline and demise of the daily newspapers. It is our opinion that broadcasters to varying degrees are fulfilling their general obligations in the public interest arena.

As requested by this Notice, we submit the following response:

**DOMESTIC**

The most recent example in the Washington, DC area was the various snow storms (December 19, 2009, January 30, 2010 and February 6, 2010). As evidence by free off-the-air

radio and television coverage, the citizenry were made aware of the potential severity of each storm, its appropriate arrival and the efforts by local governments to begin coping with the storm and its effect on regional, local, and public transportation. Minute-to-minute information was disseminated to the public by local stations about school and other closures.

#### NATIONAL AND INTERNATIONAL

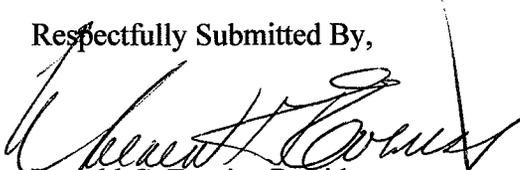
The events of 9/11 were telecast in virtually real time about the events of the terrorist flying planes into the World Trade Center, the Pentagon and Shanksville. No other medium sustained this coverage of these events (not cable nor any other medium including the so-called internet medium).

One only has to review history to discover how valuable this television coverage was in the national perspective. The effects and devastation of Japanese surprise attack at Pearl Harbor was only slowly revealed by our government to the public over a several year period after the event. In other words, the government deliberately controlled the release of information and its devastation about this attack to the nation.

In the 9/11 instance, not only the nation, but the world saw in real time the effects of the terrorist attacks. Each individual unlike the attack on Pearl Harbor saw information that was not filtered by the governmental authorities.<sup>1</sup>

The attempted Detroit "Christmas bomber" and the recent attempted New York City "Times Square bombing" are prime examples of the need for good "real-time" coverage which was furnished to the nation to our knowledge by free off-the-air broadcasting.

Respectfully Submitted By,



Donald G. Everist, President

Date: May 7, 2010

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<sup>1</sup>To a lesser extent, the Lockerbie, Pan Am Flight 103 had coverage to a large degree in real time. The undersigned is very familiar with Pan AM 103 since his oldest niece was on the flight as a passenger.