

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
2010 Quadrennial Regulatory Review )  
–Review of the Commission’s )  
Broadcast Ownership Rules and Other )  
Rules Adopted Pursuant to Section 202 )  
of the Telecommunications Act of )  
1996 )

MB Docket No. 09-182

**REPLY COMMENTS OF THE ALLIANCE FOR COMMUNITY MEDIA**

The Alliance for Community Media (“ACM”) submits these reply comments in response to the opening comments filed by the Writers Guild of America, East, AFL-CIO (“Guild”) in the above-captioned proceeding.

ACM’s mission is to advance democratic ideals by ensuring that people have access to electronic media and by promoting effective communication through community uses of media. Founded in 1976, ACM serves as the national, collective voice of the 3,000 public, educational and governmental (“PEG”) access organizations and community media centers throughout the country. It also represents the interests of millions of people who, through their local religious, community and charitable groups, use PEG access to communicate with their memberships and the community as a whole.

The FCC’s 2010 Quadrennial Review of broadcast ownership limits provides the FCC with an opportunity to ascertain anew whether members of the public have access to diverse sources of local news, public affairs and community programming so that they may be more informed and active citizens. To accomplish this goal, programming entities must have adequate resources to develop, produce and distribute programs that are local in nature, and meet basic journalistic principles of truthfulness, accuracy, fairness and public accountability, to name a few.

Local community groups, public schools, religious institutions, colleges and universities, government officials, the disabled, and second-language communities, as well as national institutions such as NASA, the US Department of Education, and the US Army, to name a few, all use PEG facilities and equipment to distribute important information to the public through cable television and the Internet. Thousands of groups, and over a million volunteer producers, directors, presenters, and technical staff, participate in PEG access and produce more than 20,000 hours of new local programming each week. That’s more hours of new weekly programming than NBC, CBS, ABC, Fox and PBS combined. ACM helps make this local programming possible by providing critical support services for these community media centers and for the primarily volunteer staff that keep these vital electronic outposts of democracy and localism in operation.

With modification, ACM supports the creative approach recommended by the Guild in its opening comments as a means of addressing the difficult problem of growing media consolidation and consequent loss of localism -- namely, the Guild's recommendation for more federal funding from media conglomerates to support public affairs programming. ACM believes, however, that the Guild's proposal to direct such funding only to public television is far too narrow a focus to adequately protect local public affairs programming. ACM respectfully requests that, as the FCC reviews the Guild's proposal, the scope of eligible funding recipients under that proposal should be expanded beyond public television to include PEG community media center organizations and programmers, all of which are an equally essential resource for delivering local news, public affairs, governmental and educational content to their respective communities. Community media centers and the PEG channels they provide serve a critical -- and often overlooked -- role in producing and delivering local news and public affairs content. The services that ACM's members provide are unique; indeed, in many markets PEG channels offer the *only* source of local news, community and public affairs programming. While ACM's members often work with public television, and intend to work with public television in the future, we respectfully request that PEG channels and community media centers not be forgotten as the FCC evaluates media ownership issues and potential options for maintaining and/or funding local programming.

Respectfully submitted,

/s/

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