

MM Docket No. 04-233
“FCC Localism Initiative”

The University Station Alliance (USA) headquartered at 1017 W Brooke Hollow Ct, Stillwater, OK, Executive Director Craig Beeby, is a grassroots non-profit 501 (c) (3) representing noncommercial public radio stations licensed to universities and colleges. One hundred and twelve (112) of these across the country are affiliated or actively involved with the USA.

The USA’s comments on the FCC “Localism Initiative” are as follows:

Community Roots and Community Service

The Federal Communications Commission (FCC) should treat noncommercial public radio differently from commercial radio on the subject of “localism”. The majority of public radio stations are locally owned and operated. Public radio exists to provide local public service. The noncommercial nature of public broadcasting helps to define the nature of our service. In the majority of communities, the last and often only “locally-owned” station is the noncommercial public radio station. Two-thirds of the Corporation for Public Broadcasting (CPB) qualified stations are licensed by colleges or universities; local public accountability is already part of their administrative structures. The local production of programming and public service is already recognized by public radio stations as critical to public service and for that matter critical for survival.

The requirement to maintain a physical presence during all hours of operation is a fiscal hardship for noncommercial stations. Public service would be reduced, not increased. In many instances, the only news-based service and/or

arts and cultural based service to sparsely populated rural areas is provided by public radio. The physical presence requirement is too expensive in rural settings. Automation allows for more, not less, local programming. Instead of spending limited dollars to “baby-sit” automated broadcast systems, the dollars could provide microphones and travel expenses to rural areas so that local producers could create local programming.

The requirement to provide a main studio in the city of license is also cost-prohibitive. Main studio waivers have enabled rural public radio stations to serve large geographic areas in this country that could not possibly support stand-alone stations. Many rural service stations are unable to afford multiple studios in low-populated communities or rural areas. Production of local programming serves these rural areas better than the establishment of unused and understaffed studios would.

Increased Regulatory Burdens

The required establishment of community advisory boards is recognized as important to the accountability a station has to the community. **However,** most colleges and universities already have boards in place to oversee the operation of their respective services and academic units. The college/university-licensed public radio stations report to these university-based boards either directly or indirectly. In some university environments a station board or even a station advisory group is restricted by the licensee or by statute from engaging in some activities (such as fiduciary control or oversight). In this case, the requirement for a separate station-based board is prohibited by the

university. The Corporation for Public Broadcasting (CPB) has always allowed university-licensed and college-licensed stations to receive grant dollars without the requirement of a station advisory board, recognizing that universities are complex and have established public structures already providing public oversight of their FCC licensed public stations.

The clarity of the word “Board” can be more complicated in university environments than for community-licensed stations or commercial stations. It could mean a Board of Regents, an advisory board, an advisory committee and/or a friends' board or friends' support group. At the very least, the station will need the flexibility to define board or advisory group, and the existing university board structures must be acceptable to meet this requirement.

Due to public radio stations' limited noncommercial resources and budgets, the burden of providing time-consuming paperwork and reports for FCC license renewal time is counter-productive to the process of producing local programming. The FCC should not be intimately involved in the local programming decision-making process. Any standards the FCC would use would be arbitrary, burdensome, and costly.