

**FEDERAL COMMUNICATIONS COMMISSION
BROADCAST LOCALISM HEARING
RAPID CITY, SOUTH DAKOTA
MAY 26, 2004**

STATEMENT OF ELEANOR ST. JOHN

Mr. Chairman, Commissioners, and all of you from the FCC, thank you so much for giving me the opportunity to speak this evening.

I'm Eleanor St. John, majority owner and General Manager of Class A Television Station KQEG-CA, LaCrescent, Minnesota. We're a UPN affiliate serving the southern part of the LaCrosse-Eau Claire, Wisconsin, DMA. I helped build this station from scratch in 1994, and I'm currently building another station in Chippewa Falls to serve the northern part of the DMA. I owned 51% of an FM station that I operated for 13 years and sold in 2002.

I am an enrolled member of the Winnebago Tribe, member of the Eagle Clan. I'm involved in community affairs every day. I not only manage my station but I also personally host a daily half-hour public affairs program. I operate cameras, keep the books, prepare the station's program schedule; do my best to keep the place running properly.

I have also been a member of the Board of Directors of the Community Broadcasters Association since 1999. CBA represents Class A and Low Power TV stations. We don't have the resources of the NAB, but we do our best to tell our local station stories to those who will listen. We are the home of small businesses, of women, minorities, and local service in the broadcasting industry. We hire people locally in our hometowns, and we serve our hometowns.

Class A stations are the only broadcast stations of any kind that have a legal requirement to broadcast local programming. We are required by statute to broadcast three hours a week. That's quite a job, but I love it. Our own community involvement helps us keep in touch with local issues and to carry what my viewers truly want to see, high school sports and real area community events.

It's great that the FCC is increasing its recognition of the value of local programming in a media world that keeps consolidating and centralizing. Maybe Class A and LPTV stations are running counter to today's trend, but we think we're the ones that are doing the real job of communicating with our communities.

There are some things you can do to make it easier for Class A stations to provide local service:

We have to keep a main studio in our service area, and that's good to provide a point of contact for the public. But we're overburdened when we must comply with the full power

rule that our main studio be staffed by two people during all regular business hours, including a manager. Class A stations are small economic units, where it's wasteful, if not financially prohibitive, for any staff member not to be active all the time wherever that person is needed – and that's often away from the station working on local programming. We should have to have only one person on site at the studio during posted hours, less than 40 hours a week -- maybe four hours each business day. It should be OK for the manager to be on call and able to come to the studio within an hour or two. We don't try to bar the doors to the public, but we have to use our limited staff efficiently.

It also doesn't make good sense to say that programming is local only if it's produced within our Grade B contour. Our DMA is our economic area of interest, and it's bigger than our Grade B contour. We should get credit for programming produced somewhere else, especially if the subject is really local, like interviewing our Congressman in Washington or carrying an away sports game back to the home team audience. These are the kinds of things our audience wants and Congress seems to have wanted us to do. We need to be able to count it all as local.

It would also be helpful if the three-hour weekly local programming requirement could be averaged over a month, so we won't have to provide "filler" local material just to meet the law when we're working on special events and other local programs that put us over three hours in some weeks but maybe under in others. The Community Broadcasters Protection Act says the requirement is an "average" of three hours a week. The word "average" is in the law, so we should be able to take advantage of it.

Thank you again for listening to me. I'm proud of my station and its community service. Class A-LPTV stations don't get a whole lot of attention in Washington circles, but we are here, everywhere throughout the country doing our local thing and trying to make a difference. We welcome your support to help do the best job we can.