

August 4, 1983

Separate Statement of  
FCC Commissioner James H. Quello  
Concurring in Part and Dissenting in Part

In re: BC Docket No. 82-345 relating to network television, financial interest and syndication rules.

I wish to make it immediately clear that the Commission's action in this docket does not reflect a decision on my part, tentative or otherwise, that the Commission should adopt this particular proposal. Therefore, I dissent to the characterization of this document as a tentative decision. Nevertheless, I fully concur in seeking public comment on this specific proposal.

I would like to note that in reviewing the comments I shall particularly look for guidance in determining whether a narrow rule such as the one proposed here would adequately ensure that independent television stations continue to have unencumbered access to off-network syndicated programming. Such programming is a staple source of revenue for independent stations, and as such it is an important part of their ability to provide the public with a diversity of viewpoints through their news and public affairs programming.

As I made explicit when the Commission heard oral presentations on this subject, I support the concept of a compromise where the networks are not unduly restricted from participation in any market so long as the Commission continues to protect the valid interests of the independent stations. Putting this proposal out for comment will, in my view, help the Commission focus on whether a narrow approach such as is presented here can meet that goal. My support of this action should not be interpreted as suggesting that my further consideration of these matters will be limited to the boundaries of this proposal.