



August 15, 2018

Michelle Carey, Esq.
Chief, Media Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Reform of the Radio Ownership Rules / MB Docket No. 18-349

Dear Ms. Carey:

The Puerto Rico Radio Broadcasters Association (“PRBA”) members strongly urge the Federal Communications Commission (“FCC”) to support the National Association of Broadcasters’ (“NAB”) proposal to deregulate the Commission’s radio ownership rules. On June 15, 2018, NAB wrote a letter that urged the FCC to modernize outdated radio ownership rules during its quadrennial media ownership review. PRBA supports this view.

As emphasized by the NAB, the existing radio ownership limits are unnecessary to promote competition in today’s audio marketplace and are more detrimental than helpful to radio stations’ ability to serve their local communities. As on the U.S. mainland, consumers in Puerto Rico have the option of listening to streaming services such as Spotify and Pandora, and Sirius XM satellite radio, Facebook and YouTube. As a result, radio stations in Puerto Rico also must compete for listeners and advertisers.

For these reasons, PRBA urges the Commission to change its radio ownership rules and supports the NAB’s proposal to allow a single entity to own or control up to eight commercial FM stations, with no limit on AM ownership in the top 75 Nielsen Audio markets, and no restrictions on the number of FM or AM stations in the unrated markets. PRBA believes that this proposal would help to level the playing field and allow radio stations to compete in today’s digital audio world. Most importantly, radio stations would be able to provide quality free, over-the-air entertainment for its consumers. The need for local radio stations was apparent during and after Hurricane Maria, as radio stations remained the only medium available for residents to receive information.

PRBA hopes that the FCC considers the NAB’s proposals as it conducts its 2018 quadrennial review of the broadcast ownership rules.

Sincerely,

Raúl M. Santiago Santos
President