RECEIVED
JUN - 2 1992
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
FCC MAIL SECTION
JUN 2 9 58 AM '92

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	GC Docket No. 92-52
	)	
Reexamination of the Policy Statement on Comparative Broadcast Hearings	)	
	)	RM-7739
	)	RM-7740
	)	RM-7741

COMMENTS OF ERIC R. HILDING

Eric R. Hilding ("Hilding") submits his comments in the above-captioned matter, for which his relevant May, 1985 Petition For Rule Making was allegedly "overlooked" by the Commission. 1/

1. Comparative Hearing Processes for new FM applications are unnecessary.

A. In MM Docket No. 89-15, the Commission admitted to an 80% failure rate of the processes to produce an alleged "best qualified applicant". 2/ From January 1, 1992 through about May 15, 1992, only about 22 mutually-exclusive FM applicant groups have been designated for hearing. This equates to a straight-line projected total of 59 for 1992. At the typical 80% settlement rate (encouraged by the Commission, which is really failure to select a "best qualified applicant"), only 12 "best qualified applicants" will be selected as a result of hearing processes.

1/ Hilding tendered his Petition For Rule Making to Amend 1965 Policy On Comparative Broadcast Hearings with the Commission in May, 1985 (7 years ago). The Commission previously acknowledged, in Eric R. Hilding v. Federal Communications Commission (United States Court of Appeals for the Ninth Circuit) circa 1987, that the Hilding petition was "pending". After five (5) additional years of waiting for the Commission to act, Hilding observed that no reference was made in the GC Docket No. 92-52 Notice of Proposed Rulemaking ("NPRM") to Hilding's primary petition. At footnote 14 of the NPRM, reference was made to three other parties who filed petitions related to a "finders preference", said petitions being filed between two and five years after the initial Hilding petition. When questioned about the matter, the Commission's Office of General Counsel indicated that the Hilding petition had been apparently "overlooked". It would appear that arbitrary and capricious inaction by the Commission is a more appropriate explanation for what really occured.

2/ Notice of Proposed Rule Making, MM Docket No. 89-15 @ footnote 12.

No. of Copies rec'd 0+9
List A B C D E

B. Going back two years, in 1991 there were only 78 mutually-exclusive FM groups designated for hearing and 86 MX FM groups designated in 1990. At the same 80% settlement factor rate, this would then appear to produce but 16 alleged "best qualified applicants" in 1991, and 17 in 1990 (if tracked to same year). 3/

C. Out of a total universe of almost 5,600 commercial FM stations, actual turnover/sales (including FM units as a part of AM/FM combos), was about 338 FM units in 1991, and 437 FM units in 1990. Since station sales and transfers of control are not subject to "comparative hearings", in light of the evidence herein, trying to perpetuate any type of alleged comparative hearing process can only bring expanded new meaning to the terms "bureaucracy" and "Governmental waste of time and taxpayer resources". With less than 20 FM actual alleged "best qualified applicants" now selected per year (and expansion of multiple ownership rules to allow any individual or group to potentially own 30 FM stations), even a modified comparative hearing process will only have as much impact upon diversity of control as the effect of a mosquito passing gas during a 7.0 Richter Scale earthquake. 4/

D. The number of designated mutually exclusive application groups, of which 80% will result in unnecessary litigation monies spent leading up to any type of a settlement, are going to geometrically decrease due to spectrum saturation. In other words, there aren't many new channels left to allocate. 5/

3/ These are approximate figures, and NOT the total Hearing Branch figures which would include renewals and revocations for all types of services.

4/ Hilding has participated in 10 proceedings actually designated for hearing, however involving only new channel allotments for which he was the finder/petitioner. No "best qualified applicant" was ever selected. **100% of the proceedings resulted in withdrawl or settlements.**

5/ Many of the yet unpetitioned for new allotments will come about only through extensive research and development necessary to effectuate "substitution" proposals. To continue to subject the pioneering entrepreneurs to a defective hearing process, even with some type of "token" finders preference, will be insufficient incentive to undertake costly and time consuming research studies. Accordingly, the public will lose the benefit of these new uncreated or undeveloped services.

E. Aside from **Unconstitutional** minority and gender preferences to atone for certain past sins in America (but two wrongs do NOT make a right), one of the purposes of the hearing processes was to expand upon Ashbacker. At the time of Ashbacker, there were only 955 standard broadcast stations authorized in America (931 stations and 24 under construction). The population of the United States was approximately 143,661,306 (about one broadcast station per every 150,431 people). The 1990 Census reflected a U.S. population of 248,709,873. However, AM,FM,TV & LPTV stations now total about 16,302 (about one broadcast station for every 15,256 people); population went up 173% while broadcast stations are up 1,707% !!!

2. There is an efficient system which is fair and just to all.

A. Regardless of race or gender, any American has the opportunity to file a Petition For Rule Making to amend the FM Table of Allotments. Emphasis on continued minority based "handouts" should be in the educational arena. In other words, educate the minorities and women on how to go about "finding" a new FM channel. If they have the money to waste in legal fees in a defective comparative hearing scheme, these funds could be put to better use in research and development and engineering fees to "discover" new opportunities. There is no rational reason to continue a system which basically just puts unnecessary litigation revenues into the pocketbooks of communications attorneys. There is no rational reason. Period.

B. Unconstitutional race or gender preferences do not promote National unity, but rather division and riots. Such preferences are but a violation of the Civil Rights to equal opportunity and due process deserving of any American. This Reverse Discrimination must be removed from **ALL** Governmental processes. 6/

6/ The time is long overdue for the Commission to exercise some intestinal fortitude in confronting Mr. Hollings and others responsible for the Unconstitutional "appropriations riders" which have perpetuated the dirge of Reverse Discrimination and contributed specificially to racial division.

C. Considering the factual and shameful evidence of a defunct application processing system allowed to far outlive any potential usefulness or "atonements", a true "first come, first serve" window filing opportunity is in order for new FM Channel "finders" (developers). The Commission's (and taxpayer's) resources can be reallocated to more meaningful and productive purposes.

D. If for any reason the channel petitioner/finder does not apply for the alloted channel, then a simple lottery selection amongst any subsequent applicants is the most effective. Keep it simple, get it done, and quit screwing around. 7/

3. Keeping alive the inefficiency and waste of time and resources.

A. If the Commission once again fails to exercise bold leadership in favor of maintaining an Administrative Edsel, additional comments are in order. In light of the universe of about 5,600 commercial FM stations, and less than 20 actual "best qualified applicants" now selected per year in a hearing process, 1965 policy factors are totally irrelevant unless also applied to every station sale or transfer of control of license. Anything less is simply a farce in view of the new increase in multiple ownership potentials to 30 FM stations per individual or group.

B. Integration. It really doesn't make any difference, since it can only amount to 1/30th of what is allowed in outright purchases or transfers of control.

C. Proposed program service. The demands of each radio marketplace may require modification of programming in order to survive. Unless every sale or transfer of control is subjected to the same criteria, it is simply absurd.

D. Past Broadcast Record. Yes ... to include a "bonus" preference for "diversity" of experience in numerous positions, including other media.

7/ In the event Mr. Ross Perot is elected President of the United States of America, as each Administrative Edsel is discovered in the bunkers of bureaucracy, those responsible for perpetuating inefficient administration will most likely find themselves "out" in the real world job market.

E. Auxiliary power. To best serve the public interest in emergencies, every broadcast station in America should have back up electrical power capabilities.

F. Diversification. Again considering the realities of expansion of the multiple ownership rules, this attribute is foolishness, as is item #G below.

G. Minority and Gender Preferences. ***U-N-C-O-N-S-T-I-T-U-T-I-O-N-A-L.*** Is there anyone with the intestinal fortitude to finally take a stand against this? 8/ Does anyone seriously think less than 20 actual CP grants by hearing per year out of a universe of 5,600 commercial FM stations is going affect diversity? Get real.

H. Local residence. Again, quite meaningless. Any responsible, serious broadcaster is going to get involved in the community. If he or she doesn't, they will suffer in the long run. To force a channel "finder" to move to a community before filing an application with an unknown number of competitive filings is going beyond the realm of reasonableness. Especially, since numerous communications law firms advertise and contact local community law firms to "dig up" people to apply for new allotments. This generates unfair trade competition and penalizes leaders. Civic participation is meant to be an indicator of a potential broadcaster's eventual interface with the community. To penalize an applicant who has demonstrated a high degree of past public service in any community (or communities) in America by restricting "civic participation" to the community of license is wrong. It is an outright slap in the face of the spirit of volunteerism, and penalizes past contributions. A bona fide public contributor deserves an "equal footing" future civic preference.

I. Efficient use of the frequency. Yes. 9/

8/ Come on now ... someone at the Commission has got to have some guts. Stand up!

9/ In his May, 1985 Petition For Rule Making To Amend 1965 Policy On Comparative Broadcast Hearings, Hilding proposed the concept (pages 11 & 12) as "Efficient Use of New Frequency Channel". Included was the novel suggestion that the applicant with the greatest population served would get the maximum category points, etc. etc.

J. Daytime preference. This makes mockery of the alleged "diversity of control" objectives of the comparative policy, which are now watered down by 30/30.

K. Service continuity preference. Yes. 10/

L. Finder's preference. At last, others have finally come forth from the safe confines of "sheepdom" and filed petitions. There is no rational reason why the Commission has failed for so many years to incorporate this even in an overall defective comparative policy. A more appropriate term to use would be that of a "R&D Preference", because it is research and development which is required. 11/

M. Additional criteria.

1. Technical merit preference. Unlike flat, Midwest terrain situations, there are many parts of the country with rolling topography to mountains and valleys which present technical challenges. It is well recognized that a "single bay" antenna results in less multipath interference (and better public reception) in certain areas than multiple bay installations. A preference merit should be awarded to applicants who take topographical and potential multipath concerns to heart.

2. Technology integration preference. The public deserves the benefits of the most current "state-of-the-art" delivery of programming. Whether compact disc audio, satellite delivery or any new technology not yet available, a preference is deserved for maximizing a high quality of new service to the public.

3. Military veteran preference. Isn't it about time??? Minority and female preferences were given for doing nothing. Military veterans risked their lives.

10/ Hilding proposed a similar concept in his comments filed in MM Docket No.'s 89-15 and 89-91, whereby the FCC would receive, on a sliding scale, various percentages of any net profits to be garnered from selling a hearing-granted facility CP and license if "trafficked" within 7 years.

11/ Considering spectrum saturation, complex substitution proposal R&D efforts, time, and expense can be quite considerable and are deserving of extra preference weighting. To classify all channel allotment petitions the same is like comparing a Rolls Royce to a Volkswagon.

If any "preferences" are to handed out in this country, they should first go to those who have been willing to lay down their lives for the preservation of "freedom", "justice" and "equal opportunity".

4. Constitutional and fiscal stewardship responsibilities of the Commission.

A. The Commission is long overdue in exercising the backbone necessary to stand up to Senators and Congressman who have played games with Unconstitutional minority and gender preferences for purposes of misleading their constituency into believing that wonderful things were being done for them. The legitimate minority hoping to start a broadcast station on a shoestring is royaly shafted by any alleged comparative hearing process because of the unnecessary and unafordable litigation expenses necessary to "play the game". Pitting American against American for any differences in skin color or genital composition should be a treasonous felony.

B. As we approach the 4 Trillion Dollar National Debt mark, it should also be a treasonous felony for any Government Agency to perpetuate such an ineffective, discriminatory failure as has been allowed to continue far too many years with the FCC's alleged comparative hearing processes. The actual number of non-settlement recipients compared to horrific legal expenses and small dent in the total expanded base universe of stations can in no way justify perpetuating the farce. It is more than deserving of National Scandal status. Any system which allows for the unscrupulous to manipulate it with token minority and/or gender "fronts" encourages criminal behavior and has no place in America, especially when it contributes to the National Debt; enriching private communications attorneys at taxpayer expense. 12/

12/ As an example, in 1989 the Federal Communications Commission requested and received an "emergency" funding of $400,000 above and beyond its fiscal 1989 budget. One of the reasons given was for broadcast applications processing. No doubt, the Commission failed to inform those on Capitol Hill that more than 80% of the proceedings involved would result in a "settlement", and that millions in litigation revenues would pour into the private sector communications law firm pockets.

What about Mr. or Ms. Italy, Portugal, or other ethnic group member supposedly a part of the great American "melting pot" of equal opportunity? Whoever first introduced the idea of "minority" preferences should be branded as a traitor.

D. In terms of serving the public interest, any system which eliminates unnecessary litigation and administrative expenses or procedures as well as decreasing any contribution to the National Debt is what is desired. Reduction of the National Debt is the most critical factor in the American public interest.

E. A prime example of the unnecessary administrative morass and gross unfairness of any system structured as has been the comparative hearing processes is "The (Horror) Story Of Mr. White" (see EXHIBIT 1). It clearly demonstrates one of the reasons why America has slipped down the slopes of mediocrity. The cancerous expansion of a "welfare mentality" throughout Federal Agency processes during the past 30 years has been a mistake. It is no coincidence that those such as Mr. Hollings and other appropriations rider "rascals" historically impeding the overdue changes in applications processing procedures are also those responsible for America's escalated Nation's debt. 13/

F. The Communications Act of 1934, as amended, does not specifically provide for the filing of mutually exclusive applications for broadcast facilities. The Commission is not mandated to solicit MX applications. 14/ **There is no rational reason why the Commission can not provide for a channel petitioner or finder (developer) "first right to file" window which acknowledges and rewards leadership regardless of skin color or genital composition.** Only in the event the

---

13/ A crafty hidden tax increase (a/k/a "Hearing Fee") implemented in 1987 didn't solve the basic underlying problem of discriminatory, ineffective use of resources inherent in the processes.

14/ Notice of Proposed Rule Making, 49 Fed. Reg., 36523, Sept. 18, 1984.

finder does not apply, is the Commission potentially obliged to provide hearing for mutually-exclusive applications who may later concurrently file applications. The Communications Act should also be further amended to reflect the change in reality of the 1990's vs. 1934. Let's get out of the dark ages and update the out-of-date.

PURSUANT TO THE FOREGOING, the Commission is requested to expedite its decision making in this matter.

Eric R. Hilding

June 1, 1992

Eric R. Hilding
P.O. Box 1700
Morgan Hill, CA 95038-1700
Tel: (408)842-2222

THE (HORROR) STORY OF MR. WHITE

as related by Eric R. Hilding

Once upon a time there was a caucasian male appropriately named Mr. White. About 10 years ago, Mr. White's father was able to save enough money and secure moderate financing to purchase a low power FM station licensed to a small community in the midwest. After graduation from college, Mr. White joined his father in the family business of running the station. Upon the Sr. White's retirement, he then assumed responsibility as General Manager of the station and eventually acquired 40% ownership.

Mr. White was the ideal FCC licensee. In addition to being a very responsible broadcaster, he received numerous awards for humanitarian contributions. As a member of various local civic organizations, Mr. White was committed to the programming of wholesome entertainment and made available generous time on the station for local charity public service announcements. He also initiated special educational programmettes to help in the fight against drug abuse. Mr. White broadcast the weekly town council meetings over the station for the benefit of the rural farming community residents, who could not always come into town during severe weather conditions.

During a major tornado disaster, Mr. White's station was the key emergency news source. His numerous contributions to public resulted in Mr. White being selected as Citizen of the Year in both his community and the State. The local advertisers gave Mr. White a special recognition dinner for the exceptional service rendered by the station, and for Mr. White's commitment to providing a reasonable rate structure for merchants. Mr. White's philosophy was that of both service and value before personal profit.

Unfortunately, Mr. White contracted a rare illness which his physician said would require him to move to a different climatic area for lifelong treatment, and within two years. Mr. White realized that this could put an end to his broadcast career, since he owned only 40% of the small midwest community family station valued at $250,000. The prospects of purchasing a station in the new area (where the smallest facility would cost $3,000,000), were at best, futile. Even so, Mr. White contact 7 broadcast brokers, but found no existing stations for sale.

Not being one to give up easily, Mr. White commissioned a well known engineering firm to see if there were any possibilities of starting a new station.

From an economic standpoint, this seemed to be the only hope of continuing his career as a broadcaster. He was informed that there were no unused frequencies available, but decided to persist in trying to find some way to overcome the possibilities. Mr. White hired another firm to look for the possibility of some type of "substitution" proposal in order to solve the problem. After many months and thousands of dollars expended, a solution was still not found.

Mr. White was a persistent person. He was convinced that there must be a solution, and decided to learn about the broadcast allocations engineering processes himself. After spending at least an hour each night for one year, Mr. White determined that at long last a unique complex substitution of frequencies would yield a new FM channel. And in view of several "X Rated" format stations in the community, Mr. White believed there was an important need for his wholesome music entertainment format used in the midwest. So the community would now eventually be able to have an alternative source of programming, and receive the benefit of Mr. White's value and experience as a broadcaster. So it seemed.

Upon filing of his Petition for Rule Making to effectuate the channel allotment, Mr. White encountered opposition. Several of the "big guns" in town did not want additional competition. In spite of 300,000 people added to the metro population with no additional stations, the local players didn't want him in town.

Mr. White, however, believed he could make a contribution. Especially strong was his desire to see programming allocated to bring about anti-drug education to young people in the evenings. He was forced to spend thousands of dollars in legal fees as well as personal time and stress to fight for his new allocation. His persistence paid off. The FCC ultimately decided that it was in the public interest, convenience and necessity to provide for the new channel allotment for which Mr. White had petitioned.

Mr. White was delayed in moving to Arizona becuase of the difficulties in finding a replacement manager to run the midwest family station. Due to the FCC's filing window for the his new channel allotment which opened earlier that expected, Mr. White had to file his application about 30 days before relocating. Due to the desirability of the new broadcast opportunity, 15 other parties filed mutually-exclusive applications. Mr. White was devastated.

This now meant up to $30,000 or more per applicant in hearing process litigation fees, or about $450,000 with absolutely no guarantee of even being granted the Construction Permit. And, the likelihood of the proceeding being dragged out for many years while the Washington attorneys played a "poker game" with the system. Mr. White's new FM station channel was like a fresh meadow muffin dropped in the barnyard on a sweltering summer day. All the flies promptly swooped in for the feast.

Mr. White unable to bear the economic burden of such a costly proceeding (he was buried before he got started). He was hopeful that competing applicants would be minimal or none at all. Based upon the 1965 Policy on Comparative Broadcast Hearings, super all-American citizen Mr. White would be assured of the following:

1. In spite of being a model citizen and broadcaster, he would receive no "local residence" credit. Mr. White filed his application before being able to move to the area (where he would have to live the rest of his life due to health). And since 10 local residents were among the 15 competing applicants, Mr. White would assuredly lose in this policy preference attribute, and receive zero credit. Even if Mr. White filed after relocating, any other applicant with longer local residence would win.

2. Mr. White is a white male. 5 of the 15 other applicants were female, which meant that Mr. White would lose again (for involuntarily born a male). He would receive zero credit for this policy preference attribute simply because he was born a male instead of female. How absurd.

3. Since 7 of the 15 other applicants were either hispanic, asian or black, for the third preference Mr. White would also lose for involuntary reasons as a result of the FCC's reverse discrimination in a comparative broadcast hearing. In other words, Mr. White would again receive zero credit in this attribute because he was born "white" instead of hispanic, asian or black. Reverse discrimination!

4. Even though Mr. White's perfect record and experience as a broadcaster would qualify him as an ideal owner/operator, for health reasons his physician suggested that he work a maximum of 29 hours per week personally

(Cont'd...)

at the new station. Since Mr. White could *therefore not meet an integration* commitment of 40 (or more) hours per week, he would most assuredly again lose since all 15 other applicants alleged to meet the maximum preference attribute credit requirement for 40 (or more) hours per week. Ridiculous.

5. In the area of civic service preference attribute credit, Mr. White would bite the bullet again because not one of his valuable civic contributions took place within the service area of the new area station. In spite of his substantial civic service history which would undoubtedly continue in the new environment, Mr. White would receive no credit. What a reward for past public service!

6. The FCC *currently* allows any person, corporation or other legal structure to own up to 12 AM, 12 FM and 12 Television stations without penalty. However, in a new broadcast application proceeding, severe penalties are imposed for any degree of other ownership. In the case of Mr. White, his desire to retain the 40% ownership in the old family station or any involvement whatsoever in the management thereof would screw him again. Since 14 of the other 15 applicants either had no broadcast ownership involvement or promised to divest of same if awarded the permit, model citizen and experienced broadcaster Mr. White would lose again because of the Commission's 1965 Policy. One of the other applicants, however, would actually *be the recipient of a preference credit* because of owning a "Daytime Only" standard broadcast station in the same new service area. This applicant had owned the AM Daytimer for 10 years, and yet took no initiative to bring about the new FM service. Worse yet, during Mr. White's costly legal battle in the rulemaking processes, the owner of the Daytimer station didn't even file supporting comments to assist in obtaining the channel allotment. Because of an amendment to the 1965 Policy, the 100% owner would receive preferential treatment while channel initiator Mr. White ends up with zip squat for having spent all his time and money in the allotment processes. The 1965 Policy is highly irrational, and makes mockery of leadership by its imposing *penalties on leaders. A channel petitioner* should have the first right to file.

7. Mr. White's only hope for any type of preference attribute in the new market channel comparative broadcast hearing would be for his past broadcast experience. Rated as the least important in a new application proceeding, his past experience (and only credit received) *would be like a fly dropping in the* soupbowl of overall attribution credits. Mr. White, as a small businessman, was forced to withdraw his application because of the excessive litigation expenses. He was aware that a channel petitioner in California had been experienced similar problems, and had been seeking reform of the 1965 Policy. Mr. White knew that the Federal Communications Commission had time and time again refused to admit that its system was ineffective and discriminatory. He knew the Californian had even sought relief in the U.S. Court of Appeals, however justice was apparently not being served. At last word, the Californian had still been waiting for over four (4) years for the FCC to act on his Petition for Rule Making to Amend 1965 Policy on Comparative Broadcast Hearings. Mr. White went into deep depression over the whole matter for the next six 6 months.

As he was beginning to recover, Mr. White picked up a copy of Broadcasting, and read an article which caused him to vomit. It seemed that the FCC had allowed a wealthy "White Knight" to enter the new channel proceeding a buy off each of the 15 applicants. This mysterious White Knight had not even filed an application or been forced to endure the hardships imposed by the 1965 Policy. Mr. White recalled his night after night exercises in trial and error experimentation with the FM frequency spectrum. And he remembered the thousands of dollars and time spent in *fighting off local opposition to getting the* channel assigned. But the most depressing memories were of being forced to withdraw his own application because of the high litigation costs, and reality that he could never have prevailed due to the reverse discrimination and other insidious credit attributes awarded others who simply leaped on the bandwagon after Mr. White had done all the up front work. "What a way to run a country", thought Mr. White, as he recalled from history many of the reasons why the Pilgrims first came to America. And he thought about the Constitution, and wondered what happened to the real meaning behind "equal opportunity".

Mr. White turned to gaze upon the *framed* Dissenting Statement of Commissioner Hyde upon implementation of the 1965 Policy:

"...I cannot believe that the public interest will be served or the processes of the Commission expedited, by the adoption of the proposed policy statement...'there's nothing static in radio but the noise.' If we are to encourage the *larger and more effective use of radio in* the public interest, we must avoid becoming static ourselves."

Several months went by when Mr. White apprehensively picked up the current issue of Broadcasting to see what was happening. He promptly vomited again after reading that the FCC was trying to implement a lottery system in lieu of a comparative hearing cycle. It was not the lottery concept which upset Mr. White, but that the Commission was still seeking to utilize female and minority type preferences, and to force channel petitioners to endure the same type of discrimination experienced for 24 years without change. Mr. White realized that even a token preference credit for channel *petitioners would still not cure the* underlying problem of FCC administrative ineffeciency, let alone the delays in bringing new service to the public. And very few new channels would be created.

Mr. White decided that the only solution was to write to each of the Congressmen and Senators involved with sub-committees which oversee the FCC. "These powerful and responsible public servants are the only ones who can bring about sorely needed changes", he thought. And Mr. White was confident that these human dynamos of Democracy would realize the deleterious effects of failing to cure the real underlying problem in new broadcast applications processing. "They should know that we need to put the time *tested, proven methods for performance* back into operation", he exclaimed, "The good old-fashioned incentive system which rewards leadership".

He began his letter with "I come from the midwest, where he who works the land earns the harvest". "We have learned some other wisdom too", he added. Mr. White paused for a moment, and then continued. **"You can't make chicken soup out of chicken poop."**

****

Eric R. Hilding is a channel creator/finder/developer responsible for the allotment of more than 15 new FM channels in California. Due to Reverse Discrimination, he still has no station of his own. Since authoring this article in 1989, Hilding has found it to be the Congressmen and Senators who are largely to blame for perpetuating the unfair, inefficient system which has contributed to the National Debt.

CERTIFICATE OF SERVICE

I, Eric R. Hilding, under penalty of perjury, hereby declare that a copy of this "COMMENTS OF ERIC R. HILDING" has been sent via First Class Mail, U.S. postage prepaid, today, June 1, 1992, to each of the following:

Office of General Counsel
Federal Communications Commission
1919 M Street, N.W. * Room 610
Washington, D.C. 20554

Downtown Copy Center
1114 21st Street, N.W.
Washington, D.C. 20036

Eric R. Hilding