

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

In the Matter of:)	
)	
Amendment of Section 74.1231(i) of)	RM-11854
the Commission's Rules on FM Broadcast)	
Booster Stations)	
)	

To: Office of the Secretary

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Kalil & Co, Inc. Comments in Support of Petition for Rulemaking

Kalil & Co., Inc. has been in the media brokerage business for over 50 years. We are involved in all phases of broadcast brokerage. Our firm has negotiated the sale and purchase of thousands of radio and television stations throughout the United States. Kalil is consistently one of the highest volume brokerage firms in the broadcast industry, according to SNL Kagan. SNL Kagan has ranked Kalil & Co., Inc. #1 for six years in a row among the media brokerage firms in the country.

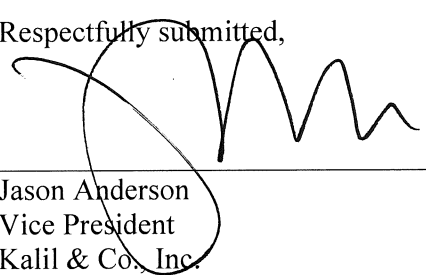
Jason Anderson, Vice President of Kalil & Co., Inc., has worked as a media broker for 5 years. In that time, he has participated in the negotiation and sale of numerous radio, television, and tower transactions worth hundreds of millions of dollars. Mr. Anderson holds a Bachelor's Degree in Architecture from the University of Arizona.

GeoBroadcast Solutions and its SFN technology is critical for radio to compete in the current advertising market. With the advent of digital advertising including competitors like Google and Facebook, traditional broadcast must develop and deploy solutions to remain

competitive and viable at the local/national levels. This technology will allow radio owners and operators to provide sophisticated marketing with quantitative results that every other non-traditional broadcast medium currently offers. Without this evolution, terrestrial radio will continue to watch advertising dollars fragment to other media outlets and markets.

When armed with this technology, radio advertising in every size market will stabilize and grow. Radio can keep more of the local advertising dollar in their respective market, which will result in more profitable stations and groups. This profitability will result in higher margins, thus higher valuations, which will attract additional outside capital and investors. Radio is essential for local communities and their social fabric. With improved financial health, radio stations and staff could serve and support their communities in an even more profound manner.

Respectfully submitted,



Jason Anderson
Vice President
Kalil & Co., Inc.