

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
2018 Quadrennial Regulatory Review – Review of)	MB Docket No. 18-349
the Commission’s Broadcast Ownership Rules and)	
Other Rules Adopted Pursuant to Section 202 of)	
The Telecommunications Act of 1996)	

JOINT REPLY COMMENTS OF BROADCAST LICENSEES

**American General Media
Beasley Media Group Licenses, LLC
Bonneville International Corporation
Bustos Media Holdings, LLC
Claro Communications, LTD
Cumulus Media Inc.
Davis Broadcasting
Entercom License, LLC
Galaxy Communications, LLC
Golden Isles Broadcasting, LLC
HEH Communications, LLC
HJV Limited Partnership
L.M. Communications**

**Mecca Communications, Inc.
Meruelo Media, LLC
Monticello Media LLC
Oconee Communications Company, LLC
QBS Broadcasting, LLC
Radio Training Network, Inc.
Roberts Communications, Inc.
Southern Stone Communications, LLC
Tri-State Communications, Inc.
Withers Broadcasting Companies/
Dana Communications Corporation
Woman’s World Broadcasting, Inc.
Word Christian Broadcasting, Inc.**

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May 29, 2019

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SUMMARY

Under Section 202(h) of the Telecommunications Act of 1996, the Commission must “repeal or modify” the Local Radio Ownership Rule if sufficient marketplace competition has developed to render the rule “no longer in the public interest.” Twenty-three years after the Local Radio Ownership Rule became law, the time has come to modernize the rule. The FCC must acknowledge what the marketplace already has: that broadcast radio stations no longer compete only against themselves.

Broadcast radio now faces an onslaught of competition in a vastly expanded, highly competitive audio market that includes dozens of platforms and services that did not even exist in 1996: Pandora, Spotify, Apple Music, Amazon Music, Google Play, SiriusXM, and YouTube, to name just a few. These powerful challengers compete in local communities for broadcast radio’s core local listeners and advertisers, and their success is demonstrated by the copious data and information submitted in these Joint Reply Comments and in other comments submitted in this proceeding. Acceptance of these digital competitors as substitutes for broadcast radio is particularly prevalent among younger demographics, signaling even greater challenges ahead for radio in the coming years. The intense market pressures now faced by local radio broadcasters are especially pronounced in smaller markets where profit margins are razor thin.

Broadcast radio’s digital competitors are corporate behemoths that exponentially exceed even the largest broadcast radio companies in size. They enjoy massive economies of scale. Radio broadcasters, however, are constrained by the Local Radio Ownership Rule from developing economies of scale that would empower them to operate more profitably and to compete more effectively against these digital giants.

Broadcast radio's strong suit is and has always been service to and involvement in local communities. Radio's digital and satellite competitors do not share the same commitment to local communities held by local broadcast radio stations and required by the FCC. If broadcast radio is to continue to implement the Commission's localism policies by providing the vital, locally-focused service that other audio providers cannot and will not deliver, radio broadcasters must be permitted to achieve economies of scale sufficient to enable them to generate much-needed resources.

The Local Radio Ownership Rule has failed to keep up with the paradigm shift that has occurred in the audio market. The rule no longer promotes competition in the marketplace, but hinders it. The Commission must modernize the Local Radio Ownership Rule to reflect present-day audio marketplace realities, and put radio broadcasters on a more equal footing with their outsized digital competitors.

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American General Media; Beasley Media Group Licenses, LLC; Bonneville International Corporation; Bustos Media Holdings, LLC; Claro Communications, LTD; Cumulus Media Inc.; Davis Broadcasting; Entercom License, LLC; Galaxy Communications, LLC; Golden Isles Broadcasting, LLC; HEH Communications, LLC; HJV Limited Partnership; L.M. Communications; Mecca Communications, Inc.; Meruelo Media, LLC; Monticello Media LLC; Oconee Communications Company, LLC; QBS Broadcasting, LLC; Radio Training Network, Inc.; Roberts Communications, Inc.; Southern Stone Communications, LLC; Tri-State Communications, Inc.; Withers Broadcasting Companies/Dana Communications Corporation; Woman’s World Broadcasting, Inc.; and Word Christian Broadcasting, Inc. (collectively, “Broadcast Licensees”), licensees of the 947 broadcast radio stations identified on Attachment A hereto, by their attorneys, hereby submit these Joint Reply Comments in support of comments filed by the National Association of Broadcasters (“NAB”) and others encouraging the FCC to modernize the Local Radio Ownership Rule in accordance with Section 202 of the Telecommunications Act of 1996 (the “1996 Act”).

I. INTRODUCTION

Broadcast Licensees are a large and exceptionally diverse group of broadcasters. They are comprised of twenty small, independent broadcasters including several minority- and/or women-owned licensees, three publicly-traded companies including the second and third largest radio companies based on revenues, and two religious broadcasters. They operate in markets ranging from Brunswick, Georgia, the 259th ranked Nielsen Audio market, to New York City, the largest market. Regardless of their size or location, each of the Broadcast Licensees believes that broadcast radio – the oldest, most-established, and most-reliable form of electronic mass media communication – remains highly relevant, and in fact vital, in the modern media environment.

Broadcast Licensees are deeply committed to providing service that focuses on local communities – whether by broadcasting breaking local news, life-saving emergency information, and public interest programming focused on local needs – or by supporting worthwhile community causes and events, conducting fundraisers for local charities, and sponsoring hometown clubs and organizations that are part of social fabric of local communities across the country. They endorse, and more importantly, *embrace*, the FCC’s localism policies. They wholeheartedly believe that being focused on serving the needs of local communities is what distinguishes broadcast radio from the myriad of other sources of audio programming available to consumers.

Broadcast Licensees support the sensible regulatory reforms proposed and supported in this proceeding by NAB. Adoption of NAB’s proposals, and in particular modernization of the Local Radio Ownership Rule, will ensure that broadcast radio’s long tradition of service to local communities will continue in the years ahead. Radio today operates in a media environment that is vastly different, and far more competitive, from that which existed in 1996 when Congress

enacted the Local Radio Ownership Rule in its current form. Broadcast radio stations no longer compete only among themselves. Today, radio faces an onslaught of competition for local listeners, and advertisers, from a plethora of audio and digital services such as satellite radio, online streaming platforms like Pandora and Spotify, websites like YouTube, and digital giants like Google, Facebook, Apple, and Amazon – none of which existed, at least in their current forms, when Congress passed the 1996 Act.¹ Many of these digital competitors are exponentially larger than any traditional radio broadcast company. Alphabet (the parent company of Google), Amazon, Apple and Facebook each has a market capitalization of between \$500 billion and \$1 trillion dollars.² By contrast, Entercom has a market capitalization of less than \$1 billion, and no other publicly traded radio company has a market capitalization of more than \$325 million.³

Twenty-three years after the 1996 Act directed the Commission to adjust its media ownership rules, including the Local Radio Ownership Rule, in response to changes in the competitive environment, the FCC must now acknowledge what broadcasters, listeners, and advertisers already have: seismic changes have occurred in the media industry that render the

¹ Google, Facebook, XM Satellite Radio, Sirius Satellite Radio, YouTube, Pandora, and Spotify were all created after adoption of the 1996 Act. See Joint Comments of Connoisseur Media, LLC, et al., MB Docket No. 18-349 (filed Apr. 29, 2019) (“Connoisseur Joint Comments”) at 4. Amazon had launched one year prior, but in 1996 was merely an online bookseller. See Avery Hartmans, *15 Fascinating Facts You Probably Didn’t Know About Amazon*, Business Insider, Aug. 23, 2018, available at <https://www.businessinsider.com/jeff-bezos-amazon-history-facts-2017-4>. Apple focused almost entirely on selling Macintosh computers, and was on the verge of bankruptcy. See Jack Nicas, *Apple Is Worth \$1,000,000,000,000. Two Decades Ago, It Was Almost Bankrupt*, NY Times, Aug. 2, 2018, available at <https://www.nytimes.com/2018/08/02/technology/apple-stock-1-trillion-market-cap.html>.

² See Comments of National Association Broadcasters, MB Docket No. 18-349 (filed April 29, 2019) (“NAB Comments”) at 26; Connoisseur Joint Comments at 11; see also Yahoo Finance, available at <https://finance.yahoo.com/>.

³ Approximate market capitalization of certain publicly-traded radio companies as of May 29, 2019 are: Entercom Communications, \$839 million; Cumulus Media, \$280 million; Saga Communications, \$178 million; Townsquare Media, \$104 million; and Beasley Broadcast Group, \$99 million. Yahoo Finance, available at <https://finance.yahoo.com/>.

concept of “siloeed” media markets obsolete. Broadcast radio is no longer *the* audio market. It is but one component in a much larger market – a market so rife with competition that some local radio broadcasters are struggling to compete, and in some instances, survive.

The digital and satellite challengers to radio are international corporate behemoths, but they compete directly with radio broadcasters on a local level. They do not share, however, broadcasters’ commitment to local communities. And they do not share, *in the least*, the FCC’s concerns about localism. The FCC’s localism policies are put into practice by local broadcasters — and by no one else. If America’s local broadcast radio stations are to continue to provide the locally focused service that the Commission so greatly values, the Commission must modify the Local Radio Ownership Rule to enable radio broadcasters to develop economies of scale so that they can compete with their exponentially larger, unregulated digital competitors. If the Commission retains the rule as-is, however, radio broadcasters’ ability to compete will continue to suffer, and service to local communities will ultimately be compromised.

II. SECTION 202(H) REQUIRES THE COMMISSION TO MODERNIZE THE LOCAL RADIO OWNERSHIP RULE.

Under Section 202(h) of the 1996 Act, the FCC is required to act if the state of market competition has changed and rendered the Local Radio Ownership Rule unnecessary.⁴ If competition has sufficiently developed, the Commission “shall repeal or modify” the rule.⁵ The

⁴ See Telecommunications Act of 1996, Pub. L. No. 104-104, § 202(h) (“The Commission . . . shall determine whether any [of the broadcast media ownership] rules are necessary . . . as the result of competition.”)

⁵ *Id.*

Commission issued the Notice of Proposed Rulemaking (“NPRM”) in this proceeding pursuant to this statutory mandate.⁶

The dramatic rise of competition in the market for audio services has caused the Local Radio Ownership Rule in its current form to become severely outdated. Rather than promoting competition, which has been the “primary rationale” for keeping the rule through the years,⁷ the Local Radio Ownership Rule now hinders it. It also threatens the long-term viability of free, over-the-air broadcast radio.⁸ The Commission must revise the rule to reflect a market definition for audio services that conforms with present-day reality.

The tide of digital and satellite audio competition against broadcast radio has been rising for over two decades. Yet in each of its quadrennial review orders, “the FCC has applied the narrowest possible market that excluded all competitors except broadcast radio stations.”⁹ This logic can no longer withstand scrutiny. To consider the “relevant product market”¹⁰ to consist only of broadcast radio stations is to take an ostrich’s approach and stick one’s head in the sand, hoping that this new reality will go away. Broadcasters, listeners, and advertisers recognize that the product market has changed. The Commission must now do so as well.

⁶ See *2018 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of Telecom Act of 1996*, Notice of Proposed Rulemaking, FCC 18-179 (rel. Dec. 13, 2018) (“NPRM”).

⁷ *Id.* at 6 (¶ 9).

⁸ See generally NAB Comments; Connoisseur Joint Comments.

⁹ NAB Comments at 28.

¹⁰ NPRM at 8 (¶ 15).

III. BROADCAST RADIO FACES FIERCE COMPETITION FROM OTHER AUDIO CONTENT PROVIDERS.

A. Digital Audio Services and Satellite Radio Compete with Radio for Local Listeners.

Evidence submitted by numerous commenters demonstrates that broadcast radio is now only one of many players in a much larger audio content market. The *Share of Ear* study conducted by Edison Research that is included with the Connoisseur Joint Comments, and the Infinite Dial 2019 study cited by NAB, validate this point.¹¹ According to Infinite Dial 2019, between 2000 and 2019, the percentage of the population that listened to online audio weekly increased from 2% to 60%.¹² Similarly, from 2003 to 2018, the number of subscribers to SiriusXM grew from 600,000 to over 34 million.¹³ The manner in which consumers access informational programming has also changed, with Sirius/XM and a multitude of podcasts taking an increasing share of listeners. These competitors vie for radio's core listeners and have been successful at pulling audience away from radio.

Certain commenters suggest that the definition of the market in which broadcast radio competes should not be broadened to include the growing number of alternative audio sources because broadcast radio is free and local.¹⁴ These conclusions ignore substantial empirical evidence which clearly demonstrates that online audio sources compete with broadcast radio for listeners and that consumers have access to numerous sources of free online audio content.

¹¹ Connoisseur Joint Comments, Exhibit A ("Share of Ear Study"); *see also* NAB Comments at 8-12.

¹² NAB Comments at 8 and n. 19, citing Infinite Dial 2019.

¹³ *Id.* at 11.

¹⁴ *See e.g.*, Comments of iHeartCommunications, Inc., MB Docket 18-349 (filed Apr. 29, 2019) ("iHeart Comments"); Comments of National Hispanic Media Coalition et al., MB Docket 18-349 (filed April 29, 2019) at 9-10.

As the comments submitted by NAB and other broadcasters make clear, the time spent listening to radio is continuing to decrease, especially in younger demographics.¹⁵ The Share of Ear Study notes that “[a]s it has become easier for consumers to listen to audio in a variety of different ways, there has been a noticeable decrease in the amount of time that Americans have spent listening to AM/FM over-the-air broadcasts.”¹⁶ Specifically, in the last five years alone, the percentage of audio listening going to broadcast radio among Americans (ages 13+) decreased 27%.¹⁷ In contrast, the share of listening to online streaming sources – i.e. pure-play streaming services, YouTube, podcasts, and broadcast radio streams – increased 43% overall.¹⁸ The overall percentage of Americans listening to internet audio has doubled since 2012.¹⁹ Based on these statistics, it is clear that consumers “view non-broadcast audio services as meaningful substitutes for local radio stations.”²⁰ The primary devices that are now used to access audio content in homes are not radios, but smartphones. NAB’s comments show that the number of homes without radios increased from 4% to 29% between 2008 and 2018, and half of the homes of 18- to 34-year-olds currently lack radios.²¹ In contrast, in early 2019, 84% of the total U.S. population (ages 12+) owned smartphones.²² Listeners with smartphones have access to a multitude of *free* sources of audio content, including Pandora, Google Play, YouTube, and

¹⁵ NAB Comments at 14; Share of Ear Study at A-1.

¹⁶ Share of Ear Study at A-1.

¹⁷ *Id.* at A-8.

¹⁸ *Id.* at A-11.

¹⁹ Connoisseur Joint Comments at 8.

²⁰ NPRM at 11 (¶ 22).

²¹ NAB Comments at 14.

²² *Id.* at 13.

podcasts. That consumers use YouTube to listen to music is further evidence of the growing reliance on other sources of audio content by consumers, many of which are free.²³

Based on the compelling evidence of the continuing decline in the share of listening to broadcast radio, the Commission must acknowledge these fundamental changes in the market, and must revise its ownership rules to reflect that local radio stations compete for audiences in a market “that includes at the least, terrestrial radio broadcasters, satellite radio providers, and providers of audio programming over the internet and to mobile devices.”²⁴ That many of these competitors are not “local,” in that they do not have a local physical presence like a main studio, does not mean they are not competing vigorously for local listeners.²⁵ The physical location from which content is delivered is irrelevant to the competitive impact.²⁶ To consumers, these services are “local” because consumers can listen to them in their local area.

B. Digital Platforms Compete with Radio for Local Advertisers.

That broadcast radio is only one component of a significantly larger audio market is corroborated by an analysis of the state of competition for local advertising. Substantial evidence makes clear that digital platforms now sell vast amounts of advertising to local businesses and compete directly and vigorously with radio for local advertising sales.

Data compiled by Borrell and Associates, and included with the Connoisseur Joint Comments, supports the conclusion that “[t]he meteoric rise of digital advertising over the past five years has forged a new reality for local media companies heavily dependent on advertising

²³ *Id.* at 9-10 (Nielsen characterizes YouTube as the “go-to source for music”); *see also* Connoisseur Joint Comments at 3.

²⁴ NAB Comments at 7-8.

²⁵ *See* Comments of Galaxy Communications, LLC, MB Docket 18-349 (filed Apr. 29, 2019) (“Galaxy Comments”) at 2-4.

²⁶ NAB Comments at 18-19.

to support their operations.”²⁷ This evidence shows that local businesses have substantially decreased print and broadcast advertising budgets in favor of “new, cheaper and more targeted marketing with an ever-expanding array of digital offerings.”²⁸ As a result, digital media’s share of local advertising has grown from 26% to 53% – in the past five years alone.²⁹ This statistic bears emphasizing: *over half of all local advertising* is now sold by digital platforms. Borrell predicts that by 2023, digital media will account for 63% of local advertising – or nearly two-thirds. NAB has provided convincing evidence showing that 90% of local advertisers now buy both digital and non-digital advertising, and that the share of local advertising budgets going to digital is growing while radio market share is eroding.³⁰ Clearly, many advertisers see advertising on digital platforms as a substitute for advertising on broadcast radio.³¹

A basic explanation of how digital advertising platforms like Google and Facebook provide advertising options for local businesses shows why local advertisers increasingly rely on digital advertising. By using the Google Ads service, a local business claims and maintains its “Google My Business” page. This page allows the local business to include photos, contact information, reviews and a short textual description. Google Ads then provides the business the opportunity to reach more potential customers by paying to boost its prominence in search results, meaning that the business will appear high in a list of search results for similar

²⁷ Connoisseur Joint Comments, Exhibit B, Statistical Data from Borrell Associates, at B-2.

²⁸ *Id.*

²⁹ *Id.* at B-6.

³⁰ NAB Comments at 23.

³¹ *Id.* at 26-28; *see also* Connoisseur Joint Comments, Exhibit C, Declarations of Executives of Cherry Creek Media, Connoisseur Media, Neuhoff Media and others.

businesses.³² Google Ads prices its advertising using a cost-per-click (CPC) metric. The local business can set a daily budget that limits how much it accrues in click costs from day to day, and can further control its budget by geotargeting potential customers by city, region, postal code, or a specific radius. An advertiser can also lower its CPC “bid” for its ads, which makes the ads show up on a lower position on the search results page.³³ The average cost per click in Google Ads is between \$1 and \$2.

Facebook allows local businesses to create a variety of different types of advertising, such as photo ads or video ads. A local advertiser chooses its advertising objective, such as promoting brand awareness, driving traffic to a web page, or generating store visits, and then targets its audience by age, location, demographics, interests, behaviors, and device type (mobile, desktop or both). Next, the advertiser sets a daily budget and specifies the time period during which its ads will run. Facebook provides detailed advertising results and metrics at the end of the advertising campaign.

That both Google and Facebook now maintain large, aggressive, local sales forces provides further evidence of how they compete directly with local radio stations.³⁴ The following examples demonstrate how these digital giants, augmented by their large local sales forces, now compete directly with radio in local markets for local advertisers’ ad dollars:

- Beasley Media Group, LLC (“Beasley”) operates 64 radio stations in 15 large and mid-size markets. In the Charlotte market, a local automobile

³² Margot da Cunha, *4 Ways Local Businesses Can Get More Out of Google*, Wordstream, Mar. 21, 2019, available at <https://www.wordstream.com/blog/ws/2015/04/06/local-business-marketing>.

³³ “How Costs Are Calculated in Google Ads,” available at <https://support.google.com/google-ads/answer/1704424?hl=en>.

³⁴ The Google and Facebook careers websites (<https://careers.google.com> and www.facebook.com/careers) collectively list hundreds of sales and marketing jobs in multiple locations throughout the United States.

dealership purchased \$120,000 in advertising from Beasley's stations in 2018. The corporate owner of the dealership recently mandated that all traditional advertising dollars be shifted to digital, with digital spending now reportedly at \$43,000 per month. The dealership will no longer meet with radio advertising executives or consider radio as part of its advertising budget.

- Beasley's Boston stations have suffered similar losses from top advertisers. A furniture store and a restaurant chain each shifted significant spending to Pandora. An ice cream company and a music theater each dropped radio entirely and moved all advertising to digital.
- Beasley's Fort Myers cluster lost all radio advertising, including morning show endorsements, from a local motorcycle dealer that shifted its entire advertising budget to digital.
- In Beasley's Wilmington, Delaware market, at least five major advertisers have shifted their entire advertising budgets to digital platforms such as Google Ads and Facebook.
- In Brunswick, Georgia, a small market ranked number 261 by Nielsen, Golden Isles Broadcasting, which owns three FM stations – the maximum permitted under the current rules – received over \$4,500 in advertising each month during 2018 from a local car dealer. Beginning in January 2019, this advertiser pulled its entire radio budget for the market and placed it with digital and social media platforms. Another large car dealership is now threatening to do the same.

- American General Media (“AGM”) owns five FM stations in the Albuquerque-Santa Fe, New Mexico market, the maximum number allowed under the current rules. In that market, several local car dealers have been instructed to place a larger portion of their advertising on digital to qualify for participation in co-op reimbursement pools. This has resulted in a decline of revenue for radio stations as advertising dollars traditionally dedicated to broadcast have moved to digital. For example, the advertising commitment of one dealer on AGM stations has decreased from \$70,000 in the first half of 2016 to \$21,000 in the first half of 2019, a decline of 70%.
- Also in Albuquerque, three advertisers have moved all or virtually all of their advertising from AGM’s stations to digital competitors including Google and Facebook, resulting in a loss of approximately \$3,000-5,000 per month in revenues. Other AGM advertisers have moved substantial portions of their advertising budgets to digital, resulting in corresponding decreases in revenues to AGM.
- In the San Luis Obispo, California market, an automotive dealer moved \$5,700 per month of its advertising budget from AGM stations to digital platforms such as You Tube, Pandora and Facebook. This represents a shift of over 20% of the dealer’s advertising budget.
- In AGM’s Santa Maria, California market, a supermarket chain was spending approximately \$4,000 per month to advertise on AGM’s stations. The supermarket has now moved all of those advertising buys to digital.

- AGM owns four FM stations in the Bakersfield, California market. Most automotive dealers in the market have been directed by manufacturers to spend their advertising budgets on digital platforms to qualify for reimbursements from co-op pools. This policy has resulted in significant declines in the amount of advertising being placed on radio by local automobile dealerships.
- In the Four Corners region of Colorado and New Mexico, AGM stations have lost approximately \$6,800 per month to digital advertising. This loss has been driven in part by the migration of advertising by auto dealers to digital in order to qualify for co-op reimbursement pools.

Puzzlingly, certain commenters have taken the position that digital and online platforms do not compete with radio for advertisers because those platforms do not have a local physical presence. For example, Urban One claims that these competitors are “primarily national in scope and do not usually have a local presence or connection in the community,”³⁵ and implies that they do not compete for the local advertising revenue in Urban One’s markets because of this. Similarly, iHeartCommunications claims that the FCC’s determination in the 2010/2014 Quadrennial Review Order – that alternative sources of audio programming are not currently meaningful substitutes for broadcast radio stations in local markets – remains valid today.³⁶ While digital platforms may not have brick-and-mortar facilities and do not share broadcasters’

³⁵ Comments of Urban One, MB Docket 18-349 (filed April 29, 2019) (“Urban One Comments”) at 5.

³⁶ iHeart Comments at 8. Paradoxically, iHeart argued vigorously in 2010 for repeal of the local radio ownership rules, based in part on the fact that satellite radio, internet-based audio platforms, the use of iPhones, smartphones and other portable media players had become ubiquitous and a competitive threat to terrestrial radio. *See Comments of Clear Channel Communications, Inc.*, 2010 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Communications Act of 1996, MB Docket No. 09-182, at 8-13 (2010).

commitment to supporting local communities, the implication that such platforms are not competing directly with radio for local advertising because they lack this form of local “presence” is fundamentally incorrect, as the multitude of evidence provided by Broadcast Licensees and other broadcasters demonstrates.

C. The Increased Competition for Listeners and Advertisers Has a Major Impact on Broadcasters in Smaller Markets.

As the examples set forth above and in comments submitted by numerous other radio broadcasters show, stations in markets of all sizes are losing listeners to online audio sources, and advertisers to digital platforms. The impact of this digital competition is particularly severe for stations in smaller markets with more limited advertising bases. In many smaller markets, certain stations struggle even to cover their fixed costs.³⁷ NAB’s comments include a study conducted by BIA Advisory Services which shows that stations in markets below 75 face the greatest challenge because these markets have smaller populations and economic bases.³⁸ For example, in the smallest Nielsen audio radio markets (201-265), the average station earned only 7.1% of the amount of revenue earned by the average station in a top 10 market.³⁹

Several of the Broadcast Licensees operate in medium, small, or unrated markets. Their experiences are similar to the scenarios described by NAB. There are fewer local businesses in their markets to whom they can sell advertising. These advertisers have limited budgets and are moving some, or in certain cases, all, of their advertising dollars to digital platforms and using advertising services offered by Google, Facebook and other digital platforms. When this happens, the impact on these stations’ operating margins is severe; in many cases, it becomes

³⁷ See NAB Comments at 5 and 32.

³⁸ *Id.* at 31-32.

³⁹ *Id.* at 31.

extremely difficult for them to continue to cover fixed costs, and impacts their ability to pay competitive salaries to local talent and to upgrade equipment.⁴⁰

Attached hereto at Attachment B is a report prepared by BIA Advisory Services which updates a 2017 report analyzing the local advertising market in Syracuse, New York (Nielsen Audio Market 98).⁴¹ The 2017 study showed that between 2014 and 2021, the share of local advertising revenue of *all* Syracuse local radio stations was projected to decrease from 12.3% to 9.8%, while the share of local advertising revenue garnered by Google, Facebook and Bing in 2021 would be 19.8%. The attached updated analysis indicates that currently, in 2019, the percentages are already down to 10% for radio stations' over-the-air advertising, and up to 27.9% for online platforms (representing online sites not associated with traditional media properties) and mobile sites and apps. The updated 2019 report states that online and digital media are expected to experience double digit growth over the next few years, and that by 2023, the share of local ad revenue for *all* broadcast radio stations will be 9.1%, whereas the share garnered by Google, Facebook and Bing will total 24.3%. Google alone is projected to capture 17.9% of all local advertising dollars in the Syracuse market by 2023. The updated 2019 report concludes that "the competitive impact of firms such as Google on local advertising markets is especially acute in medium and small markets."⁴² If no changes are made in the FCC ownership limits, many broadcasters in small and mid-sized markets will find it difficult to survive, let alone to generate the resources necessary to provide news, emergency information and other services that are fundamental to the Commission's localism objectives.

⁴⁰ *Id.* at 31-32.

⁴¹ The 2017 BIA Analysis was included with Comments filed in this proceeding by one of the Broadcast Licensees, Galaxy Communications, LLC, which owns radio stations in Syracuse and Utica, New York. *See* Galaxy Comments at Attachment A.

⁴² Updated 2019 BIA Analysis attached hereto as Attachment B at 10.

IV. BROADCASTERS MUST BE ALLOWED TO DEVELOP ECONOMIES OF SCALE IN ORDER TO COMPETE IN THE MODERN MEDIA ENVIRONMENT.

The Local Radio Ownership Rule, as currently formulated, provides a clear advantage to broadcast radio's digital competitors. Digital companies can create as large a footprint in a local market as business opportunities dictate, thereby generating and benefitting from significant economies of scale. Radio broadcasters, on the other hand, cannot, because they are constrained by the rule. If broadcast radio is to continue providing the locally focused service that other providers of audio cannot and will not, radio broadcasters must be permitted to achieve greater scale and efficiencies.

If broadcasters are permitted to combine a greater number of stations in a local market under common ownership, redundant facilities such as multiple studios and office space can be eliminated. In some situations, transmission facilities can be combined at common sites, or possibly by duplexing on common antennas. Back office services such as financial reporting, billing, accounts payables and traffic can be consolidated. These opportunities will result in savings which will boost cash flow, enabling greater resources to be deployed to improve programming and service to the public.⁴³

The Commission's current ownership rules tend to leave radio stations, particularly FM stations, as "stranded plant" in local markets. Two or three leading station groups in a market often each acquire the maximum number of stations permitted by Commission rules, with the remaining stations owned by struggling companies that lack the resources to provide meaningful

⁴³ For example, in 2016-2017, AGM acquired stations in markets in which it already had a presence: Albuquerque-Santa Fe, New Mexico, San Luis Obispo, California, and Santa Maria, California. By adding to, or in the case of Albuquerque, realigning, its portfolio in those markets, AGM has been able to increase profitability, expand its platform of formats, fortify its brands, and bring to the markets greater local engagement than was previously possible. *See also* Connoisseur Joint Comments at 23-24.

local programming and community involvement. This situation is borne out by the analysis conducted by BIA Advisory Services, which is attached to and discussed in NAB's Comments.⁴⁴ By relaxing ownership limitations, those struggling stations could become part of larger station groups that will generate additional cash flow, and as a result, improve the ability to provide local service.⁴⁵

The benefits of permitting additional station combinations are the greatest in small markets, where, as discussed above, revenues are comparatively small but competition from digital platforms is nonetheless robust.⁴⁶ Furthermore, in smaller markets and rural areas, broadcast radio stations are frequently the primary source for information during emergencies and a key source for local news, roles which the stations (and their communities) highly value and want to continue. Achieving greater economies of scale will enable stations in smaller markets to enhance their ability to serve their communities. For example, in recent years, news staffs at local newspapers have been reduced substantially as newspapers drastically cut costs. Local radio stations can help fill this gap, and in expanding their news operations will be better able to respond rapidly with news and information in cases of natural disasters or other emergency situations. Local sports have also traditionally been a mainstay of local radio programming. With greater scale, stations will be able to increase their coverage of local sporting events and news.

⁴⁴ NAB Comments, Attachment A, "Local Radio Station Viability in the New Media Marketplace," BIA Advisory Services.

⁴⁵ See NAB Comments at 37-38.

⁴⁶ See Comments of West Virginia Radio Corp., MB Docket 18-349 (filed April 29, 2019) at 5 (noting that removing ownership limits is particularly important for smaller broadcasters).

As other commenters note, more diverse programming will result from relaxation of the Commission's ownership limitations.⁴⁷ When a broadcaster acquires a station that has a format that duplicates a format that already exists in that broadcaster's group, there will be a strong incentive to change one station's programming rather than to operate two stations in the same format.⁴⁸

The need for greater format diversity has increased in recent years as Nielsen has shifted its ratings reporting from diaries to portable people meters ("PPM"). The PPM system tends to incentivize stations to select formats with the greatest mass appeal. As a result, the PPM system has had the effect of homogenizing radio with respect to formats. For example, in several large markets, there are at least two radio stations which broadcast the country music format, the most popular radio format in the United States. In some mid-sized markets such as Knoxville, Tennessee (Market 72), there are at least three country stations. Often, these stations have nearly identical playlists. If the owner of one of the duplicative stations were to acquire one of the other stations with the same format, as would be permitted under the NAB proposal, the acquiring company almost certainly would not continue to maintain two stations with virtually identical playlists, but would instead adjust programming to differentiate them. Another example of this situation is in the Miami market, where there are two Top 40 stations with nearly identical playlists. If these stations were combined under common ownership, the new owner would likely adjust or change the format of one of the stations, thus bringing greater programming diversity to the market.

⁴⁷ NAB Comments at 38-39; Connoisseur Joint Comments at 22-23.

⁴⁸ See Connoisseur Joint Comments at 23.

The resources generated through economies of scale will also enable radio broadcasters to more aggressively compete with digital media companies by enhancing their own existing digital platforms and services. Local radio stations tend to have highly engaged audiences attracted by local content, which uniquely positions these stations to develop digital brands around matters of local interest such as news, politics and sports. Moreover, very few radio stations impose a paywall for their web-based content, making their digital content, like their over-the-air broadcasts, free and available to all. Greater scale will enable radio broadcasters to invest more heavily in digital content and platforms, thereby increasing their ability to compete in this space with their larger digital competitors.

V. THE SUBCAPS ON AM/FM OWNERSHIP SHOULD BE ELIMINATED OR UPDATED IN RESPONSE TO COMPETITION IN THE AUDIO MARKET.

Broadcast Licensees support the NAB's position that the FM subcap should be modified in the top 75 markets and eliminated in the remaining markets, and that the FCC should eliminate the current cap on the number of AM radio stations a broadcaster can own. If, despite the compelling evidence submitted in this proceeding supporting relaxation and/or elimination of the ownership tiers, the Commission declines to make such changes, it should at a minimum eliminate the subcaps.

In light of the AM band's diminishing relevance as a competitive force, there is simply no basis to continue to limit the number of AM stations a licensee can own in a particular market. As the Commission recognized in 2013, "[t]he availability of higher fidelity alternatives and increased interference to AM radio has led to a steady decline in AM listenership."⁴⁹ Since then, despite the Commission's AM revitalization efforts, the trend toward diminishing AM

⁴⁹ *In the Matter of Revitalization of the AM Radio Service*, Notice of Proposed Rulemaking, 28 FCC Rcd 15221, 15223 (2013).

audience share and revenues has continued.⁵⁰ The plight of AM radio stations can be alleviated, at least to some extent, by allowing AM station owners to develop efficiencies of scale.

Some commenters have asserted that the elimination of the FM subcaps will cause the AM band to become less viable as a media service, resulting in a decrease in opportunities for new entrants to the broadcast radio industry and a loss of opportunities for the launch of new and more diverse programming.⁵¹ Salem Media Group (“Salem”), for example, asserts that removal of the subcaps will result in a “devaluation of the AM Band” and that the “resulting migration of leading radio brands to the FM Band could accelerate a departure of the AM audience.”⁵² Salem claims that elimination of the subcaps could cause radio group owners to consolidate their ownership in FM stations, leaving listeners “disenfranchised,” eradicating formats, and increasing risk in times of crisis.⁵³ Other commenters claim that eliminating the subcaps will hasten the demise of independently family-owned broadcast stations and squeeze out minorities.⁵⁴

These assertions of gloom and doom if the subcaps are eliminated are speculative and poorly reasoned. Many of the Broadcast Licensees are independent family-owned businesses. Ten are minority- and/or women- owned. They all wholeheartedly support elimination of the subcaps. They believe that, if the subcaps are eliminated, small, independent broadcasters will

⁵⁰ See NAB Comments at 34-35.

⁵¹ See, e.g., Comments of Salem Media Group, MB Docket 18-349 (filed Apr. 29, 2019) (“Salem Comments”); Comments of Crawford Broadcasting Company, MB Docket 18-349 (filed Apr. 26, 2019); Comments of National Association of Black Owned Broadcasters, MB Docket 18-349 (filed April 29, 2019); iHeart Comments.

⁵² Salem Comments at 4.

⁵³ *Id.*

⁵⁴ Comments of King City Communications Corp., MB Docket 18-349 (filed April 29, 2019) at 2; Urban One Comments at 7-8.

gain the ability to acquire small-market stations that are currently struggling, build much-needed economies of scale, and better serve their communities and audiences. They do not believe that large broadcasters will be likely to seek to acquire additional stations in smaller markets.

Despite the assertions of Salem and others that removal of the subcaps will cause a “bleeding out” of AM radio listeners,⁵⁵ there is no discernable causal link between a migration of popular formats from AM to FM stations and the collapse of AM radio as a viable service. Even assuming, *arguendo*, that elimination of the subcaps will result in some popular AM radio programming moving to FM stations, and a corresponding migration of AM listeners to the FM band, the AM band will continue to exist and AM stations will continue to be licensed. In fact, migration of some programming formats from the AM to the FM band would likely result in more AM stations being placed on the market for sale. This would create an inventory of AM stations with viable facilities available to new entrants and small broadcasters, on which new and more diverse and niche formats could thrive.

Broadcast Licensees believe that continuing to impose ownership subcaps is precisely the wrong response to the diminishing relevance of the AM band as a competitive force and a source of local programming. The subcaps unreasonably restrict competition and market forces which, if unfettered, would result in the delivery of better programming service to a greater number of listeners. Moreover, the subcaps do not promote new entry to the industry, diversity of programming, or improved local service. For these reasons, Broadcast Licensees urge the Commission to eliminate the subcaps. These changes would enable broadcast radio stations to be owned and operated in combinations which make economic and business sense, rather than being artificially restrained by regulation.

⁵⁵ Salem Comments at 7.

VI. CONCLUSION

Competition flourishes in today's audio marketplace. Broadcast radio now competes with massive, international corporations for radio's traditional mainstay – local listeners and advertisers. Today's product market is unrecognizable from that which existed in 1996 when the current Local Radio Ownership Rule was enacted, and now includes dozens of platforms and services that have launched in the more than two decades since the rule went into effect.

Based on the evidence submitted in these Reply Comments and in comments already in the record, Broadcast Licensees encourage the Commission to follow the directive of Section 202(h) of the Telecommunications Act of 1996 and to modernize the Local Radio Ownership Rule to reflect current audio marketplace realities.

Respectfully submitted,

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May 29, 2019

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ATTACHMENT A

Broadcast Licensees

American General Media

KABG(FM), Los Alamos, NM
KIOT(FM), Los Lunas, NM
KJFA(AM), Belen, NM
KFJA-FM, Pecos, NM
KKRG-FM, Santa Fe, NM
KKSS(FM), Santa Fe, NM
KLVO(FM), Belen, NM
KBOX(FM), Lompoc, CA
KEBT(FM), Lost Hills, CA
KERN(AM), Wasco-Greenacres, CA
KGEO(AM), Bakersfield, CA
KGFM(FM), Bakersfield, CA
KISV(FM), Bakersfield, CA
KKAL(FM), Paso Robles, CA
KKJG(FM), San Luis Obispo, CA
KKXX-FM, Shafter, CA
KPAT(FM), Orcutt, CA
KRQK(FM), Lompoc, CA
KSMA(AM), Santa Maria, CA
KSNI-FM, Santa Maria, CA
KSTT-FM, Atascadero, CA
KVEC(AM), San Luis Obispo, CA
KZOZ(FM), San Luis Obispo, CA
KDGO(AM), Durango, CO
KENN(AM), Farmington, NM
KISZ-FM, Cortez, CO
KKDG(FM), Durango, CO
KPRT-FM, Kirtland, NM
KPTE(FM), Bayfield, CO
KRTZ(FM), Cortez, CO
KRWN(FM), Farmington, NM
KVFC(AM), Cortez, CO

Beasley Media Group Licenses, LLC

KCYE(FM), Boulder City, NV
KDWN(AM), Las Vegas, NV
KKLZ(FM), Las Vegas, NV
KOAS(FM), Dolan Springs, AZ
KVGS(FM), Meadview, AZ

WAEC(AM), Atlanta, GA
WAZZ(AM), Fayetteville, NC
WBAV-FM, Gastonia, NC
WBCN(AM), Charlotte, NC
WBEN-FM, Philadelphia, PA
WBOS(FM), Brookline, MA
WBQT(FM), Boston, MA
WBZ-FM, Boston, MA
WCHZ-FM, Warrenton, GA
WCSX(FM), Birmingham, MI
WCTC(AM), New Brunswick, NJ
WDHA-FM, Dover, NJ
WDRR(FM), Martinez, GA
WFLB(FM), Laurinburg, NC
WGAC(AM), Augusta, GA
WGAC-FM, Harlem, GA
WGUS-FM, New Ellenton, SC
WHFS(AM), Seffner, FL
WHHD(FM), Clearwater, SC
WHSR(AM), Pompano Beach, FL
WJBR-FM, Wilmington, DE
WJBX(FM), North Fort Myers, FL
WJPT(FM), Fort Myers, FL
WJRZ-FM, Manahawkin, NJ
WKLb-FM, Waltham, MA
WKML(FM), Lumberton, NC
WKQC(FM), Charlotte, NC
WKXC-FM, Aiken, SC
WLLD(FM), Lakeland, FL
WMGC-FM, Detroit, MI
WMGK(FM), Philadelphia, PA
WMGQ(FM), New Brunswick, NJ
WMMR(FM), Philadelphia, PA
WMTR(AM), Morristown, NJ
WNKS(FM), Charlotte, NC
WPBB(FM), Holmes Beach, FL
WPEG(FM), Concord, NC
WPEN(FM), Burlington, NJ
WQYK-FM, St. Petersburg, FL
WRAT(FM), Point Pleasant, NJ
WRBQ-FM, Tampa, FL
WRCA(AM), Watertown, MA
WRIF(FM), Detroit, MI
WROR-FM, Framingham, MA
WRXK-FM, Bonita Springs, FL
WSBR(AM), Boca Raton, FL

WSOC-FM, Charlotte, NC
WTEL(AM), Philadelphia, PA
WTMR(AM), Camden, NJ
WUKS(FM), St. Pauls, NC
WWCN(AM), Fort Myers Beach, FL
WWDB(AM), Philadelphia, PA
WWNN(AM), Pompano Beach, FL
WWWE(AM), Hapeville, GA
WXKB(FM), Cape Coral, FL
WXTU(FM), Philadelphia, PA
WUUU(FM), Safety Harbor, FL
WZFX(FM), Whiteville, NC

Bonneville International Corporation

KBLX-FM, Berkeley, CA
KEPN(AM), Lakewood, CO
KHTK(AM), Sacramento, CA
KIRO(AM), Seattle, WA
KIRO-FM, Tacoma, WA
KKFN(FM), Longmont, CO
KMVP-FM, Phoenix, AZ
KMQ-FM, San Francisco, CA
KNCI(FM), Sacramento, CA
KOIT(FM), San Francisco, CA
KOSI(FM), Denver, CO
KRSP-FM, Salt Lake City, UT
KSFI(FM), Salt Lake City, UT
KSL(AM), Salt Lake City, UT
KSL-FM, Midvale, UT
KTAR(AM), Phoenix, AZ
KTAR-FM, Glendale, AZ
KTTH(AM), Seattle, WA
KUFX(FM), San Jose, CA
KYGO-FM, Denver, CO
KYM(AM), Sacramento, CA
KZZO(FM), Sacramento, CA

Bustos Media Holdings, LLC

KDDS-FM, Elma, WA
KGDD(AM), Portland, OR
KMIA(AM), Auburn-Federal Way, WA
KMMG(FM), Benton City, WA
KMNA(FM), Mabton, WA
KOOR(AM), Milwaukie, OR

KQRR(AM), Oregon City, OR
KREH(AM), Pecan Grove, TX
KSND(FM), Monmouth, OR
KTGV(FM), Oracle, AZ
KTVX(AM), Mabank, TX
KVOI(AM), Cortaro, AZ
KXET(AM), Mount Angel, OR
KYXE(FM), Union Gap, WA
KZML(FM), Quincy, WA
KZNW(FM), Oak Harbor, WA
KZSJ(AM), San Martin, CA
KZTA(FM), Naches, WA
KZTB(FM), Milton-Freewater, OR
KZUS(FM), Ephrata, WA
KZXR(AM), Prosser, WA
KZXR-FM, Prosser, WA
KZZR(FM), Government Camp, OR

Claro Communications LTD.

KBRN(AM), Boerne, TX
KEDA(AM), San Antonio, TX
KKLF(AM), Richardson, TX
KMZZ(FM), Bishop, TX
KOPY(AM), Alice, TX
KOPY-FM, Alice, TX
KUKA(FM), San Diego, TX

Cumulus Media Inc.

KAMO-FM, Rogers, AR
KAOK(AM), Lake Charles, LA
KARX(FM), Canyon, TX
KAYD-FM, Silsbee, TX
KBBM(FM), Jefferson City, MO
KBBQ-FM, Van Buren, AR
KBBY-FM, Ventura, CA
KBCY(FM), Tye, TX
KBED(AM), Nederland, TX
KBIU(FM), Lake Charles, LA
KBXR(FM), Columbia, MO
KCDD(FM), Hamlin, TX
KDVB(FM), Effingham, KS
KDVV(FM), Topeka, KS
KEHK(FM), Brownsville, OR
KFAY(AM), Farmington, AR

KFRU(AM), Columbia, MO
KHAY(FM), Ventura, CA
KHXS(FM), Merkel, TX
KIKR(AM), Beaumont, TX
KJMO(FM), Linn, MO
KKEG(FM), Bentonville, AR
KKGB(FM), Sulphur, LA
KLIK(AM), Jefferson City, MO
KLSZ-FM, Fort Smith, AR
KLUR(FM), Wichita Falls, TX
KMAJ(AM), Topeka, KS
KMAJ-FM, Carbondale, KS
KMCK-FM, Prairie Grove, AR
KMGV(FM), Fresno, CA
KMJ(AM), Fresno, CA
KMJ-FM, Fresno, CA
KMJJ-FM, Shreveport, LA
KNRQ(FM), Harrisburg, OR
KNSH(AM), Canyon, TX
KOLI(FM), Electra, TX
KOMS(FM), Poteau, OK
KOQL(FM), Ashland, MO
KPLA(FM), Columbia, MO
KPUR(AM), Amarillo, TX
KPUR-FM, Claude, TX
KQHN(FM), Waskom, TX
KQIZ-FM, Amarillo, TX
KQLK(FM), De Ridder, LA
KQSM-FM, Fayetteville, AR
KQXC-FM, Wichita Falls, TX
KQXY-FM, Beaumont, TX
KRMD(AM), Shreveport, LA
KRMD-FM, Oil City, LA
KRMW(FM), Cedarville, AR
KRUZ(FM), Oak View, CA
KSCR(AM), Eugene, OR
KSKS(FM), Fresno, CA
KTCX(FM), Beaumont, TX
KTLT(FM), Anson, TX
KTOP(AM), Topeka, KS
KTOP-FM, St. Mary's, KS
KUGN(AM), Eugene, OR
KUJZ(FM), Creswell, OR
KVEN(AM), Ventura, CA
KVMA-FM, Shreveport, LA
KVYB(FM), Santa Barbara, CA

KWIC(FM), Topeka, KS
KWYE(FM), Fresno, CA
KXZZ(AM), Lake Charles, LA
KYKZ(FM), Lake Charles, LA
KYNG(AM), Springdale, AR
KYYI(FM), Burkburnett, TX
KZEL-FM, Eugene, OR
KZRK-FM, Canyon, TX
WAAV(AM), Leland, NC
WABD(FM), Mobile, AL
WALG(AM), Albany, GA
WAOA-FM, Melbourne, FL
WAYS(AM), Macon, GA
WBBW(AM), Youngstown, OH
WBLX-FM, Mobile, AL
WBMQ(AM), Savannah, GA
WBNQ(FM), Bloomington, IL
WBWN(FM), Le Roy, IL
WBZE(FM), Tallahassee, FL
WBZF(FM), Hartsville, SC
WCMG(FM), Latta, SC
WCOA(AM), Pensacola, FL
WCYN-FM, Cynthiana, KY
WDAI(FM), Pawleys Island, SC
WDEN-FM, Macon, GA
WDLT-FM, Saraland, AL
WDUZ(AM), Green Bay, WI
WDUZ-FM, Brillion, WI
WDZZ-FM, Flint, MI
WEAS-FM, Springfield, GA
WEBE(FM), Westport, CT
WEGC(FM), Sasser, GA
WFAS(AM), White Plains, NY
WFNC(AM), Fayetteville, NC
WFTW(AM), Ft. Walton Beach, FL
WGLF(FM), Tallahassee, FL
WGNI(FM), Wilmington, NC
WGOK(AM), Mobile, AL
WHBT(AM), Tallahassee, FL
WHBX(FM), Tallahassee, FL
WHGB(AM), Harrisburg, PA
WHHY-FM, Montgomery, AL
WHKR(FM), Rockledge, FL
WHOT-FM, Youngstown, OH
WHRP(FM), Gurley, AL
WICC(AM), Bridgeport, CT

WIXV(FM), Savannah, GA
WJAD(FM), Leesburg, GA
WJBC(AM), Bloomington, IL
WJBC-FM, Pontiac, IL
WJCL-FM, Savannah, GA
WJEZ(FM), Dwight, IL
WJLG(AM), Savannah, GA
WJTQ(FM), Pensacola, FL
WKAK(FM), Albany, GA
WKKO(FM), Toledo, OH
WKOR-FM, Columbus, MS
WKRU(FM), Allouez, WI
WKSM(FM), Ft. Walton Beach, FL
WKXS-FM, Leland, NC
WLBY(AM), Saline, MI
WLFF(FM), Georgetown, SC
WLLF(FM), Mercer, PA
WLTO(FM), Nicholasville, KY
WLWI(AM), Montgomery, AL
WLWI-FM, Montgomery, AL
WLXX(FM), Lexington, KY
WLZN(FM), Macon, GA
WLZR(AM), Melbourne, FL
WMAC(AM), Macon, GA
WMEZ(FM), Pensacola, FL
WMGB(FM), Montezuma, GA
WMGU(FM), Southern Pines, NC
WMIM(FM), Luna Pier, MI
WMNX(FM), Wilmington, NC
WMSP(AM), Montgomery, AL
WMXS(FM), Montgomery, AL
WMXT(FM), Pamplico, SC
WMXU(FM), Starkville, MS
WNAM(AM), Neenah-Menasha, WI
WNBM(FM), Bronxville, NY
WNCV(FM), Shalimar, FL
WNMQ(FM), Columbus, MS
WNNF(FM), Cincinnati, OH
WNNK-FM, Harrisburg, PA
WOFX-FM, Cincinnati, OH
WOGB(FM), Reedsville, WI
WOSH(AM), Oshkosh, WI
WPEZ(FM), Jeffersonville, GA
WPIC(AM), Sharon, PA
WPKR(FM), Omro, WI
WQKL(FM), Ann Arbor, MI

WQLH(FM), Green Bay, WI
WQPD(FM), Marion, SC
WQQK(FM), Goodlettsville, TN
WQQO(FM), Sylvania, OH
WQSM(FM), Fayetteville, NC
WQVE(FM), Albany, GA
WQXK(FM), Salem, OH
WRCQ(FM), Dunn, NC
WROK-FM, Sebastian, FL
WRQN(FM), Bowling Green, OH
WRRX(FM), Gulf Breeze, FL
WRWM(AM), Conway, SC
WSEA(FM), Atlantic Beach, SC
WSM-FM, Nashville, TN
WSMS(FM), Artesia, MS
WSOM(AM), Salem, OH
WSSO(AM), Starkville, MS
WSYN(FM), Surfside Beach, SC
WTKA(AM), Ann Arbor, MI
WTYB(FM), Bluffton, SC
WUMP(AM), Madison, AL
WVBO(FM), Winneconne, WI
WVLK(AM), Lexington, KY
WVLK-FM, Richmond, KY
WVNN(AM), Athens, AL
WVNN-FM, Trinity, AL
WWCK(AM), Flint, MI
WWCK-FM, Flint, MI
WWFF-FM, New Market, AL
WWFN-FM, Lake City, SC
WWIZ(FM), West Middlesex, PA
WWLD(FM), Cairo, GA
WWQQ-FM, Wilmington, NC
WWTN(FM), Hendersonville, TN
WWW-FM, Ann Arbor, MI
WWWX(FM), Oshkosh, WI
WXB-FM, Milton, FL
WAFX(FM), Prattville, AL
WXKR(FM), Port Clinton, OH
WXQW(AM), Fairhope, AL
WXZZ(FM), Georgetown, KY
WYFM(FM), Sharon, PA
WYMB(AM), Manning, SC
WYNN(AM), Florence, SC
WYNN-FM, Florence, SC
WYZB(FM), Mary Esther, FL

WZAT(FM), Tybee Island, GA
WZCY-FM, Mechanicsburg, PA
WZNS(FM), Ft. Walton Beach, FL
WZYP(FM), Athens, AL
KAAY(AM), Little Rock, AR
KARN(AM), Little Rock, AR
KARN-FM, Sheridan, AR
KATC-FM, Colorado Springs, CO
KATM(FM), Modesto, CA
KATT-FM, Oklahoma City, OK
KBEE(FM), Salt Lake City, UT
KBER(FM), Ogden, UT
KBGG(AM), Des Moines, IA
KBOI(AM), Boise, ID
KBUL-FM, Carson City, NV
KBZU(FM), Albuquerque, NM
KCSF(AM), Colorado Springs, CO
KCUB(AM), Tucson, AZ
KDJK(FM), Mariposa, CA
KDRF(FM), Albuquerque, NM
KENZ(FM), Provo, UT
KESP(AM), Modesto, CA
KGGO(FM), Des Moines, IA
KHKI(FM), Des Moines, IA
KHKK(FM), Modesto, CA
KHOP(FM), Oakdale, CA
KHTB(FM), Ogden, UT
KHYT(FM), Tucson, AZ
KIIM-FM, Tucson, AZ
KIPR(FM), Pine Bluff, AR
KIZN(FM), Boise, ID
KJJY(FM), West Des Moines, IA
KJOY(FM), Stockton, CA
KKAT(FM), Salt Lake City, UT
KKFM(FM), Colorado Springs, CO
KKGL(FM), Nampa, ID
KKMG(FM), Pueblo, CO
KKND(FM), Port Sulphur, LA
KKOB(AM), Albuquerque, NM
KKOB-FM, Albuquerque, NM
KKOH(AM), Reno, NV
KKPK(FM), Colorado Springs, CO
KKWD(FM), Bethany, OK
KLAL(FM), Wrightsville, AR
KMEZ(FM), Belle Chasse, LA
KMGA(FM), Albuquerque, NM

KNEK(AM), Washington, LA
KNEK-FM, Washington, LA
KNEV(FM), Reno, NV
KNML(AM), Albuquerque, NM
KPZK(AM), Little Rock, AR
KQFC(FM), Boise, ID
KQXL-FM, New Roads, LA
KRRQ(FM), Lafayette, LA
KRST(FM), Albuquerque, NM
KSMB(FM), Lafayette, LA
KSZR(FM), Oro Valley, AZ
KTBL(AM), Los Ranchos, NM
KTIK(AM), Nampa, ID
KTIK-FM, New Plymouth, ID
KTUC(AM), Tucson, AZ
KUBL-FM, Salt Lake City, UT
KURB(FM), Little Rock, AR
KVOR(AM), Colorado Springs, CO
KWIN(FM), Lodi, CA
KWNN(FM), Turlock, CA
KWPN(AM), Moore, OK
KWQW(FM), Boone, IA
KWYL(FM), South Lake Tahoe, CA
KXKC(FM), New Iberia, LA
KYIS(FM), Oklahoma City, OK
WAPI(AM), Birmingham, AL
WAQX-FM, Manlius, NY
WARM(AM), Scranton, PA
WBBF(AM), Buffalo, NY
WBBL(AM), Whitehall, MI
WBHD(FM), Olyphant, PA
WBHT(FM), Mountain Top, PA
WBSX(FM), Hazleton, PA
WCTO(FM), Easton, PA
WEAN-FM, Wakefield-Peacedale, RI
WEDG(FM), Buffalo, NY
WEMX(FM), Kentwood, LA
WFBE(FM), Flint, MI
WFYR(FM), Elmwood, IL
WGFY(FM), Gallatin, TN
WGKX(FM), Memphis, TN
WGLO(FM), Pekin, IL
WGOC(AM), Kingsport, TN
WGOW(AM), Chattanooga, TN
WGOW-FM, Soddy-Daisy, TN
WGRF(FM), Buffalo, NY

WHLN(AM), Niagara Falls, NY
WHNN(FM), Bay City, MI
WHTS(FM), Coopersville, MI
WHTT-FM, Buffalo, NY
WIBR(AM), Baton Rouge, LA
WILZ(FM), Saginaw, MI
WIOG(FM), Bay City, MI
WIOV(AM), Reading, PA
WIOV-FM, Ephrata, PA
WISW(AM), Columbia, SC
WIVK-FM, Knoxville, TN
WIWF(FM), Charleston, SC
WIXO(FM), Peoria, IL
WJCW(AM), Johnson City, TN
WJOX(AM), Birmingham, AL
WJOX-FM, Birmingham, AL
WJQX(FM), Helena, AL
WJRW(AM), Grand Rapids, MI
WKDF(FM), Nashville, TN
WKIM(FM), Munford, TN
WKLQ(FM), Holland, MI
WKOS(FM), Kingsport, TN
WKQZ(FM), Midland, MI
WKY(AM), Oklahoma City, OK
WLAV-FM, Grand Rapids, MI
WLAW(FM), Whitehall, MI
WLCS(FM), North Muskegon, MI
WLEV(FM), Allentown, PA
WLTN(AM), New Castle, IN
WLXC(FM), Columbia, SC
WMDH-FM, New Castle, IN
WMGL(FM), Ravenel, SC
WMGS(FM), Wilkes-Barre, PA
WMOS(FM), Stonington, CT
WNKT(FM), Eastover, SC
WNML(AM), Knoxville, TN
WNML-FM, Friendsville, TN
WNTQ(FM), Syracuse, NY
WOGT(FM), East Ridge, TN
WOKI(FM), Oliver Springs, TN
WOMG(FM), Lexington, SC
WORC-FM, Webster, MA
WPRO(AM), Providence, RI
WPRO-FM, Providence, RI
WPRV(AM), Providence, RI
WQGN-FM, Groton, CT

WQHZ(FM), Erie, PA
WQUT(FM), Johnson City, TN
WQXA-FM, York, PA
WRBO(FM), Como, MS
WRIE(AM), Erie, PA
WRKN(FM), Picayune, MS
WRQQ(FM), Hammond, LA
WSJR(FM), Dallas, PA
WSKO(AM), Syracuse, NY
WSKZ(FM), Chattanooga, TN
WSSX-FM, Charleston, SC
WTCB(FM), Orangeburg, SC
WTMA(AM), Charleston, SC
WTNR(FM), Greenville, MI
WTRX(AM), Flint, MI
WUHT(FM), Birmingham, AL
WVEL(AM), Pekin, IL
WVIB(FM), Holton, MI
WWFX(FM), Southbridge, MA
WWKI(FM), Kokomo, IN
WWKL(FM), Hershey, PA
WWKX(FM), Woonsocket, RI
WWLI(FM), Providence, RI
WWLS-FM, The Village, OK
WWSN(FM), Newaygo, MI
WWWZ(FM), Summerville, SC
WXKC(FM), Erie, PA
WXLN(AM), Groton, CT
WXLO(FM), Fitchburg, MA
WXXM(FM), Millington, TN
WXOK(AM), Port Allen, LA
WXSM(AM), Blountville, TN
WXTA(FM), Edinboro, PA
WXTL(FM), Syracuse, NY
WZPW(FM), Peoria, IL
WZRH(FM), LaPlace, LA
WZRR(FM), Birmingham, AL
KFFG(FM), Los Altos, CA
KFOG(FM), San Francisco, CA
KLIF-FM, Haltom City, TX
KNBR(AM), San Francisco, CA
KRBE(FM), Houston, TX
KSAN(FM), San Mateo, CA
KTCK(AM), Dallas, TX
KTCT(AM), San Mateo, CA
WARM-FM, York, PA

WFMS(FM), Fishers, IN
WFTK(FM), Lebanon, OH
WGLD(AM), Manchester Township, PA
WGRR(FM), Hamilton, OH
WJJK(FM), Noblesville, IN
WNDX(FM), Lawrence, IN
WNNX(FM), College Park, GA
WNTR(FM), Indianapolis, IN
WRRM(FM), Cincinnati, OH
WSBA(AM), York, PA
WSOX(FM), Red Lion, PA
WWWQ(FM), Atlanta, GA
WXNT(AM), Indianapolis, IN
WZPL(FM), Greenfield, IN
KABC(AM), Los Angeles, CA
KGO(AM), San Francisco, CA
KLOS(FM), Los Angeles, CA
KQRS-FM, Golden Valley, MN
KSCS(FM), Fort Worth, TX
KSFO(AM), San Francisco, CA
KTCK-FM, Flower Mound, TX
KXXR(FM), Minneapolis, MN
WABC(AM), New York, NY
WBAP(AM), Fort Worth, TX
WDRQ(FM), Detroit, MI
WDVD(FM), Detroit, MI
WGVX(FM), Lakeville, MN
WJR(AM), Detroit, MI
WKHX-FM, Marietta, GA
WKQX(FM), Chicago, IL
WLS(AM), Chicago, IL
WLS-FM, Chicago, IL
WLUP(FM), Cambridge, MN
WMAL(AM), Washington, DC
WMAL-FM, Woodbridge, VA
WPLJ(FM), New York, NY
WRQX(FM), Washington, DC
WWWM-FM, Eden Prairie, MN
WYAY(FM), Gainesville, GA
KCFX(FM), Harrisonville, MO
KCHZ(FM), Ottawa, KS
KCJK(FM), Garden City, MO
KCMO(AM), Kansas City, MO
KCMO-FM, Shawnee, KS

KMJK(FM), North Kansas City, MO
KLIF(AM), Dallas, TX
KPLX(FM), Fort Worth, TX

Davis Broadcasting

WCHK(AM), Canton, GA
WJZA(AM), Decatur, GA
WLKQ-FM, Buford, GA
WNSY(FM), Talking Rock, GA
WEAM-FM, Buena Vista GA
WFXE(FM), Columbus, GA
WIOL(AM), Columbus, GA
WIOL-FM, Waverly Hall, GA
WKJZ(FM), Eufaula, AL
WOKS(AM), Columbus, GA

Entercom License, LLC

KALC(FM), Denver, CO
KALV-FM, Phoenix, AZ
KAMP-FM, Los Angeles, CA
KAMX(FM), Luling, TX
KBZT(FM), San Diego, CA
KCBS(AM), San Francisco, CA
KCBS-FM, Los Angeles, CA
KCSP(AM), Kansas City, MO
KDGS(FM), Andover, KS
KDKA(AM), Pittsburgh, PA
KDKA-FM, Pittsburgh, PA
KEYN-FM, Wichita, KS
KEZK-FM, St. Louis, MO
KEZW(AM), Aurora, CO
KFBZ(FM), Haysville, KS
KFH(AM), Wichita, KS
KFRC-FM, San Francisco, CA
KFRG(FM), San Bernardino, CA
KFTK-FM, Florissant, MO
KFXX(AM), Portland, OR
KGMZ(AM), San Francisco, CA
KGMZ-FM, San Francisco, CA
KGON(FM), Portland, OR
KHMZ(FM), Houston, TX
KHTP(FM), Tacoma, WA
KIFM(AM), West Sacramento, CA
KIKK(AM), Pasadena, TX

KILT(AM), Houston, TX
KILT-FM, Houston, TX
KISW(FM), Seattle, WA
KITS(FM), San Francisco, CA
KJCE(AM), Rollingwood, TX
KJKK(FM), Dallas, TX
KKDO(FM), Fair Oaks, CA
KKHH(FM), Houston, TX
KKMJ-FM, Austin, TX
KKWF(FM), Seattle, WA
KLLC(FM), San Francisco, CA
KLOL(FM), Houston, TX
KLUC-FM, Las Vegas, NV
KLUV(FM), Dallas, TX
KMBZ(AM), Kansas City, MO
KMBZ-FM, Kansas City, MO
KMLE(FM), Chandler, AZ
KMNB(FM), Minneapolis, MN
KMOX(AM), St. Louis, MO
KMPS(AM), Hesperia, CA
KMTT(AM), Vancouver, WA
KMOV(FM), Fort Worth, TX
KMXB(FM), Henderson, NV
KNDD(FM), Seattle, WA
KNOU(FM), St. Louis, MO
KNRK(FM), Camas, WA
KNSS(AM), Wichita, KS
KNSS-FM, Clearwater, KS
KNX(AM), Los Angeles, CA
KOOL-FM, Phoenix, AZ
KQKS(FM), Lakewood, CO
KQMT(FM), Denver, CO
KQPS(FM), Palm Desert, CA
KQRC-FM, Leavenworth, KS
KRBZ(FM), Kansas City, MO
KRBQ(FM), San Francisco, CA
KRLD(AM), Dallas, TX
KRLD-FM, Fort Worth, TX
KROQ-FM, Pasadena, CA
KRSK(FM), Molalla, OR
KRTH(FM), Los Angeles, CA
KRXQ(FM), Sacramento, CA
KSEG(FM), Sacramento, CA
KSFM(FM), Woodland, CA
KSON(FM), San Diego, CA
KSWD(FM), Seattle, WA

KTWV(FM), Los Angeles, CA
KUDL(FM), Sacramento, CA
KVFG(FM), Victorville, CA
KVIL(FM), Highland Park-Dallas, TX
KWFN(FM), San Diego, CA
KWJJ-FM, Portland, OR
KWOD(AM), Kansas City, KS
KXFG(FM), Menifee, CA
KXNT(AM), North Las Vegas, NV
KXQQ-FM, Henderson, NV
KXSN(FM), San Diego, CA
KXST(AM), North Las Vegas, NV
KXTE(FM), Pahrump, NV
KYCH-FM, Portland, OR
KYKY(FM), St. Louis, MO
KYW(AM), Philadelphia, PA
KYXY(FM), San Diego, CA
KYY5(AM), Kansas City, KS
KZJK(FM), St. Louis Park, MN
KZPT(FM), Kansas City, KS
WAAF(FM), Westborough, MA
WAOK(AM), Atlanta, GA
WAXY(AM), South Miami, FL
WBBM(AM), Chicago, IL
WBBM-FM, Chicago, IL
WBEB(FM), Philadelphia, PA
WBEE-FM, Rochester, NY
WBEN(AM), Buffalo, NY
WBMX(FM), Chicago, IL
WBT(AM), Charlotte, NC
WBT-FM, Chester, SC
WBTJ(FM), Richmond, VA
WBZA(FM), Rochester, NY
WBZU(AM), Scranton, PA
WBZZ(FM), New Kensington, PA
WCBS(AM), New York, NY
WCBS-FM, New York, NY
WCCO(AM), Minneapolis, MN
WCFS-FM, Elmwood Park, IL
WCMF-FM, Rochester, NY
WDAF-FM, Liberty, MO
WDCH-FM, Bowie, MD
WDOK(FM), Cleveland, OH
WDSY-FM, Pittsburgh, PA
WDZH(FM), Detroit, MI
WEAL(AM), Greensboro, NC

WEEI(AM), Boston, MA
WEEI-FM, Lawrence, MA
WEZB(FM), New Orleans, LA
WFAN(AM), New York, NY
WFAN-FM, New York, NY
WFBC-FM, Greenville, SC
WFNZ(AM), Charlotte, NC
WGGY(FM), Scranton, PA
WGR(AM), Buffalo, NY
WHLL(AM), Springfield, MA
WIAD(FM), Bethesda, MD
WILK(AM), Wilkes-Barre, PA
WILK-FM, Avoca, PA
WINS(AM), New York, NY
WIP-FM, Philadelphia, PA
WJFK(AM), Morningside, MD
WJFK-FM, Manassas, VA
WJMH(FM), Reidsville, NC
WJZ(AM), Baltimore, MD
WJZ-FM, Catonsville, MD
WKBU(FM), New Orleans, LA
WKIS(FM), Boca Raton, FL
WKRF(FM), Tobyhanna, PA
WKRK-FM, Cleveland Heights, OH
WKRZ(FM), Freeland, PA
WKSE(FM), Niagara Falls, NY
WKTK(FM), Crystal River, FL
WKXJ(FM), Crystal River, FL
WKZN(AM), West Hazleton, PA
WLFP(FM), Germantown, TN
WLIF(FM), Baltimore, MD
WLKK(FM), Wethersfield Twnshp, NY
WLMG(FM), New Orleans, LA
WLND(FM), Signal Mountain, TN
WLNK(FM), Charlotte, NC
WLYF(FM), Miami, FL
WLZL(FM), College Park, MD
WMAS-FM, Enfield, CT
WMC(AM), Memphis, TN
WMC-FM, Memphis, TN
WMFS(AM), Memphis, TN
WMFS-FM, Bartlett, TN
WMHX(FM), Waunakee, WI
WMJX(FM), Boston, MA
WMMM-FM, Verona, WI
WMQX(FM), Pittston, PA

WMXJ(FM), Pompano Beach, FL
WMYX-FM, Milwaukee, WI
WNCX(FM), Cleveland, OH
WNEW-FM, New York, NY
WNSH(FM), Newark, NJ
WNVZ(FM), Norfolk, VA
WNYL(FM), New York, NY
WOCL(FM), Deland, FL
WODS(FM), Boston, MA
WOGL(FM), Philadelphia, PA
WOLX-FM, Baraboo, WI
WOMC(FM), Detroit, MI
WOMX-FM, Orlando, FL
WORD(AM), Spartanburg, SC
WPAW(FM), Winston Salem, NC
WPET(AM), Greensboro, NC
WPGC-FM, Morningside, MD
WPHT(AM), Philadelphia, PA
WPOW(FM), Miami, FL
WPTE(FM), Virginia Beach, VA
WPXY-FM, Rochester, NY
WQAL(FM), Cleveland, OH
WQAM(AM), Miami, FL
WQMG-FM, Greensboro, NC
WQMP(FM), Daytona Beach, FL
WRCH(FM), New Britain, CT
WRNL(AM), Richmond, VA
WROC(AM), Rochester, NY
WROQ(FM), Anderson, SC
WRVA(AM), Richmond, VA
WRVQ(FM), Richmond, VA
WRVR(FM), Memphis, TN
WRXL(FM), Richmond, VA
WRXR-FM, Rossville, GA
WSCR(AM), Chicago, IL
WSFS(FM), Miramar, FL
WSKY-FM, Micanopy, FL
WSMW(FM), Greensboro, NC
WSPA-FM, Spartanburg, SC
WSSP(AM), Milwaukee, WI
WSTR(FM), Smyrna, GA
WTDY-FM, Philadelphia, PA
WTIC(AM), Hartford, CT
WTIC-FM, Hartford, CT
WTPT(FM), Forest City, NC
WTSS(FM), Buffalo, NY

WTVR-FM, Richmond, VA
WUSN(FM), Chicago, IL
WUSY(FM), Cleveland, TN
WVEE(FM), Atlanta, GA
WVEI(AM), Worcester, MA
WVEI-FM, Westerly, RI
WVKL(FM), Norfolk, VA
WWBX(FM), Boston, MA
WWDE-FM, Hampton, VA
WWEI(FM), Easthampton, MA
WWJ(AM), Detroit, MI
WWKB(AM), Buffalo, NY
WWL(AM), New Orleans, LA
WWL-FM, Kenner, LA
WWMX(FM), Baltimore, MD
WWWL(AM), New Orleans, LA
WWWS(AM), Buffalo, NY
WXRT(FM), Chicago, IL
WXSS(FM), Wauwatosa, WI
WXYT(AM), Detroit, MI
WXYT-FM, Detroit, MI
WYCD(FM), Detroit, MI
WYRD(AM), Greenville, SC
WYRD-FM, Simpsonville, SC
WZGC(FM), Atlanta, GA
WZMX(FM), Hartford, CT

Galaxy Communications, LLC

WKRH(FM), Fair Haven, NY
WKRL-FM, North Syracuse, NY
WSGO(AM), Oswego, NY
WTKV(FM), Minetto, NY
WTKW(FM), Bridgeport, NY
WTLA(AM), North Syracuse, NY
WZUN(AM), Sandy Creek-Pulaski, NY
WZUN-FM, Phoenix, NY
WIXT(AM), Little Falls, NY
WKLL(FM), Frankfort, NY
WRNY(AM), Rome, NY
WTLB(AM), Utica, NY
WUMX(FM), Rome, NY

Golden Isles Broadcasting, LLC

WRJY(FM), Brunswick, GA

WSSI(FM), Darien, GA
WXMK(FM), Dock Junction, GA

HEH Communications, LLC

KHVL(AM), Huntsville, TX
KSAM-FM, Huntsville, TX

HJV Limited Partnership

WAYZ(FM), Hagerstown, MD
WBHB-FM, Waynesboro, PA
WCBG(AM), Waynesboro, PA
WNUZ(FM), Mercersburg, PA

L.M. Communications

WCDA(FM), Versailles, KY
WGKS(FM), Paris, KY
WLXG(AM), Lexington, KY
WBTF(FM), Midway, KY
WBVX(FM), Carlisle, KY
WMON(AM), Montgomery, WV
WMXE(FM), South Charleston, WV
WSCW(AM), South Charleston, WV
WCOO(FM), Kiawah Island, SC
WYBB(FM), Folly Beach, SC
WJYP(AM), St. Albans, WV
WKLC-FM, St. Albans, WV

Mecca Communications, Inc.

WXAG(AM), Athens, GA

Meruelo Media, LLC

KDAY(FM), Redondo Beach, CA
KDEY-FM, Ontario, CA

Monticello Media LLC

WBRW(FM), Blacksburg, VA
WCHV(AM), Charlottesville, VA
WCHV-FM, Charlottesville, VA
WCYK-FM, Staunton, VA

WHTE-FM, Ruckersville, VA
WKAV(AM), Charlottesville, VA
WPSK-FM, Pulaski, VA
WRAD(AM), Radford, VA
WRAD-FM, Radford, VA
WVHK(FM), Christiansburg, VA
WZGN(FM), Crozet, VA

Oconee Communications Company, LLC

WKZR(FM), Milledgeville, GA
WMVG(AM), Milledgeville, GA

QBS Broadcasting, LLC

WBQO(FM), St. Simons Island, GA

Radio Training Network, Inc.

KCKJ(FM), Sarcoxie, MO
KWFC(FM), Springfield, MO
KWND(FM), Springfield, MO
WAFJ(FM), Belvedere, SC
WAHP(FM), Cokesbury, SC
WALC(FM), Charleston, SC
WAQV(FM), Crystal River, FL
WBIJ(FM), Saluda, SC
WCCE(FM), Buies Creek, NC
WCFJ(FM), Irmo, SC
WCIE(FM), North Port Richie, FL
WCRJ(FM), Jacksonville, FL
WDVH-FM, Trenton, SC
WEPC(FM), Belton, SC
WFLJ(FM), Frostproof, FL
WGFJ(FM), Cross-Hill, SC
WHIJ(FM), Ocala, FL
WIZB(FM), Abbeville, AL
WJFH(FM), Sebring, FL
WJIS(FM), Bradenton, FL
WJLF(FM), Gainesville, FL
WLFA(FM), Asheville, NC
WLFH(FM), Claxton, GA
WLFJ-FM, Greenville, SC
WLFS(FM), Port Wentworth, GA
WMJB(FM), Murrells Inlet, SC
WMSL(FM), Athens, GA

WPFJ(AM), Franklin, NC
WPHH(FM), Hope Hull, AL
WRAF(FM), Toccoa Falls, GA
WRFJ(FM), Fort Mill, SC
WRTP(FM), Franklinton, NC
WTXR(FM), Toccoa Falls, GA
WVFJ-FM, Greenville, GA
WWWD(FM), Bolingbroke, GA
WZAE(FM), Wadley, GA
WZLC(FM), Summerville, SC

Roberts Communications, Inc.

WQMJ(FM), Forsyth, GA

Southern Stone Communications, LLC

WAHR(FM), Huntsville, AL
WFKX(FM), Henderson, TN
WHMM-FM, Henderson, TN
WJAK(AM), Jackson, TN
WLOR(AM), Huntsville, AL
WRTT-FM, Huntsville, AL
WWYN(FM), McKenzie, TN
WZDQ(FM), Humboldt, TN

Tri-State Communications, Inc.

WJLA-FM, Ellijay, GA
WPGY(AM), Ellijay, GA

Withers Broadcasting Companies
Dana Communications Corporation

KAPE(AM), Cape Girardeau, MO
KBXB(FM), Mount Vernon, IL
KGMO(FM), Cape Girardeau, MO
KJXX(AM), Jackson, MO
KRHW(AM), Sikeston, MO
KYRK(FM), Taft, TX
WDDD-FM, Johnston City, IL
WFRX(AM), Mount Vernon, IL
WGKY(FM), Wickliffe, KY
WHET(FM), West Frankfort, IL
WMIX(AM), Mount Vernon, IL

WMIX-FM, Mount Vernon, IL
WMOK(AM), Metropolis, IL
WREZ(FM), Metropolis, IL
WTAO-FM, Murphysboro, IL
WVZA(FM), Herrin, IL
WZZL(FM), Reidland, KY
WMCL(AM), Mcleansboro, IL
WQRL(FM), Benton, IL

Woman's World Broadcasting, Inc.

WTSH-FM, Aragon, GA

Word Christian Broadcasting, Inc.

WDCY(AM), Douglasville, GA
WDPC(AM), Dallas, GA
WNEA(AM), Newnan, GA

ATTACHMENT B

Updated Analysis of Local Radio Station's Share

In the Syracuse, NY Media Market

Mark R. Fratrik, Ph.D.

Sr. Vice President, Chief Economist

BIA Advisory Services, LLC

May 15, 2019



Introduction

In a previously submitted study, we examined the wider local advertising market in the Nielsen Audio defined Syracuse radio market as of February 22, 2017.¹ This present study updates the information included in that earlier study. Our conclusion is the same. Local radio stations increasingly compete directly with digital and social media platforms for both viewing and advertising revenue. In fact, some of these new services have eclipsed local radio. According, local radio ownership regulations must be revised to reflect these fundamental changes, especially in medium and small markets such as Syracuse.

In the two years since our prior study was completed, significant changes in the competitive local media environment have continued and even accelerated. In a market like Syracuse, NY there continues to be numerous radio and television stations, as well as daily and weekly newspapers, providing a wide variety of different viewpoints. These “traditional” media properties are owned by many different owners.

Added to that listing of traditional media sources are a number of highly competitive non-broadcast local advertising platforms that provide alternative sources of information and entertainment through online websites and mobile apps. Consumers in the Syracuse, NY market continue to have a growing number of choices to turn to for news, information, and entertainment. Local advertisers now have multiple new non-broadcast online and mobile apps available to place targeted advertising messages. For example, as the following analysis demonstrates, local, digital advertising revenue captured by major social media platforms such as Google, Facebook, and Bing combined (\$55.1 million) exceeds the advertising revenue garnered by all of the local Syracuse radio stations (\$31.2 million). In fact, Google’s share of the Syracuse advertising market (\$41.2 million), by itself, exceeds the combined advertising revenue share of all over-the-air local radio stations (\$31.2 million) as well as the share obtained by the digital platforms of these radio stations.

¹ See Galaxy Communications, LLC comments in In the Matter of 2018 Quadrennial Regulatory Review — Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, MB Docket No. 18-349, Attachment A (hereafter referred to as “2017 Syracuse Report.”)

The purpose of this paper is to update the information illustrating the position of local radio stations in this increasingly diverse Syracuse, NY media marketplace in which they all compete. Through the use of BIA's ADVantage service,² we can assess the relative importance of non-traditional media in providing alternative sources of news, information and entertainment by "following the money trail." Local advertisers are increasingly utilizing other advertising platforms and media because consumers are increasingly gravitating to those new media as sources for news, information and entertainment.

The 2017 analysis showed that the competition for local advertising revenue was increasingly more competitive with the success of new online/digital companies vying for both audiences and advertisers. Our updated analysis of the Syracuse market demonstrates that there continues to be dramatic changes in local market competition and that Syracuse like other local media markets is now defined by intense competition for local advertising revenue across all media platforms, including traditional and social media.

The competitive impact of new media technologies continues to be especially acute in medium and small markets such as Syracuse. After analyzing this wider media market in Syracuse, NY, it is clear that while local radio stations are an important player, there are an increasing number of choices for consumers to access news, information, and entertainment. As a result, the relative share of local advertising revenue captured by local radio stations in this market has been decreasing in recent years. The 2017 report estimated that for 2017, the share of advertising revenue for all radio stations over-the-air advertising would be 11.4% while online would be 11.8% and mobile would be 8.6%. Our new estimates indicates for 2019 that the actual percentages are 10.0% for radios stations' over the air advertising revenue, online 13.9%, and mobile 14.0%. Therefore, it seems only appropriate that the current radio local ownership rules, which were designed before the emergence and dramatic growth of these new media platforms seem outdated and ripe for revision. Importantly it is clear that the competitive impact of social media is not confined to the largest markets.

² BIA's ADVantage service is a comprehensive examination of the local media marketplace providing estimates for 16 different advertising platforms for all local markets. This service is subscribed by all different local media companies ranging from the traditional media companies as well as the newer online companies. These subscribers use these estimates for planning and strategic purposes.

Wider Market for Information, News and Entertainment

As noted in the 2017 report, there are incredible changes in the wider media marketplace with the increased number of alternative sources for news, information, and entertainment. From the increased popularity of hundreds of cable/satellite delivered networks to the increased number of mobile apps available on smartphones to the almost infinite number of websites, consumers have an ever-expanding number of choices to access news, information, and entertainment.

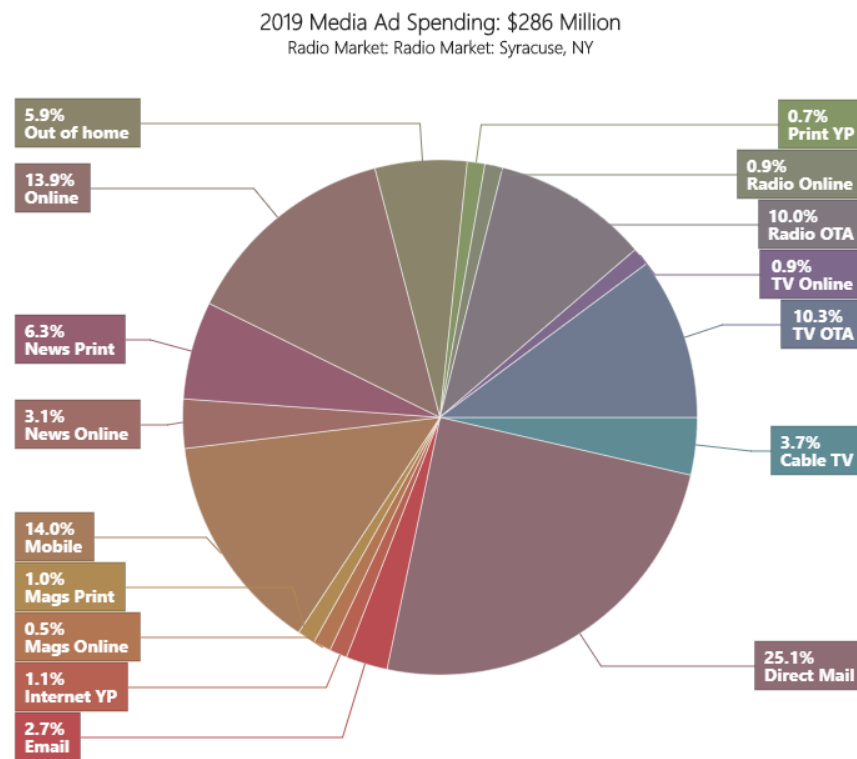
In response to this significant increase in choices being offered to consumers and advertisers migrating to these new media, BIA started offering information on this wider marketplace. Specifically, BIA provides its ADVantage service where estimates on advertising revenue are provided showing the relative position of all the different media/advertising platforms now available in the local markets.

Syracuse, NY Radio Market View

To get a sense of this wider marketplace in which local radio stations now competes, Figure 1 shows the BIA ADVantage 2019 estimated results depicting the advertising shares of the various media/advertising platforms for the Syracuse, NY radio market.³

³ The Syracuse, NY radio market is the 98th radio market ranked in terms of population by Nielsen Audio and encompasses three counties in upstate New York.

Figure 1 – 2019 Syracuse, NY Radio Market Media Ad View: Media/Ad Platforms Shares



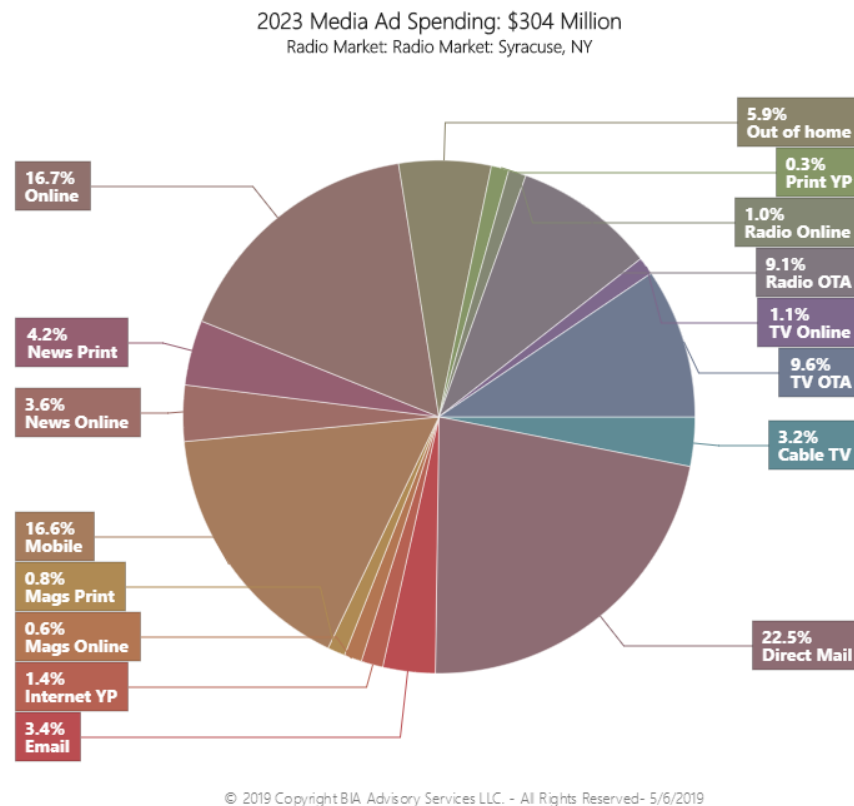
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Source: BIA ADVantage, 2019

As seen, all local radio stations generate one tenth (10.0%) of the total local advertising revenue from their over-the-air broadcasts. On the other hand, several new media are garnering significant and increasing shares of this local advertising market, reflecting consumers' use of those media for news, information, and entertainment. Online, representing the online sites not associated with traditional media properties, now attracts enough users to garner nearly one-seventh (13.9%) of the total advertising spending in this market. In similar fashion, mobile sites and apps attracting a considerable usage by consumers also now realize one-seventh (14.0%) of this advertising revenue. These new online/digital media are expected to experience double-digit growth over the next few years, indicating the increasing appetite for consumers to access news, information, and entertainment with these new media. Together non-broadcast online services and new mobile services account of 27.9% of total advertising revenue, nearly three times the amount for traditional over the air radio which is at 10%.

To see the potential impact of these new other media providing news, information, and entertainment, one only has to look at the estimates of their shares only four years later and see how much they are expected to change. Figure 2 shows the ADVantage 2023 estimated Syracuse, NY estimates depicting the advertising shares of the various media/advertising platforms.

Figure 2 - 2023 Syracuse, NY Radio Market Media Ad View: Media/Ad Platforms Shares



Source: BIA ADVantage, 2019.

Given the expected increased use of the new media, the share of local advertising revenue attributable to local radio stations over-the-air advertising will decrease to 9.1%. In contrast, the online sites not associated with traditional media properties, will attract enough users to garner over one-sixth (16.7%) of that local advertising revenue. Mobile advertising will also continue to increase rapidly, also reaching one-sixth (16.6%) of that total advertising revenue, once again reflecting the increased use of mobile devices for accessing news, information, and

entertainment. Together, these new competitive services will garner 33.3% of local advertising revenue, compared to the portion (9.1%) attributed to OTA radio which continues to decline.

The following table shows the actual dollar amounts for these 16 advertising platforms for the two years – 2019 and 2023.

Table 1 - Local Media Advertising Platforms Revenue for 2017, 2019 & 2023 for the Syracuse Radio Market (\$000s)

Advertising Platform	2017⁴	2019	2023	Percent Change (2017-2023)
Cable TV	11,822	\$10,503	\$9,607	-18.7%
Direct Mail	67,352	\$71,865	\$68,431	1.6%
Email	4,858	\$7,613	\$10,231	110.6%
Internet YP	4,476	\$3,216	\$4,251	-5.0%
Mags Online	3,166	\$1,329	\$1,917	-39.5%
Mags Print	1,056	\$2,780	\$2,279	115.8%
Mobile	29,094	\$40,175	\$50,510	73.6%
News Online	22,456	\$8,960	\$10,918	-51.4%
News Print	6,666	\$17,899	\$12,688	90.3%
Online	33,703	\$39,652	\$50,659	50.3%
Out of home	15,302	\$16,794	\$17,999	17.6%
Print YP	3,609	\$2,034	\$806	-77.7%
Radio Online	2,290	\$2,520	\$3,110	35.8%
Radio OTA	30,200	\$28,500	\$27,600	-8.6%
TV Online	1,670	\$2,617	\$3,295	97.3%
TV OTA	34,335	\$29,593	\$29,238	-14.8%
TOTAL	272,055	\$286,048	\$303,539	11.6%

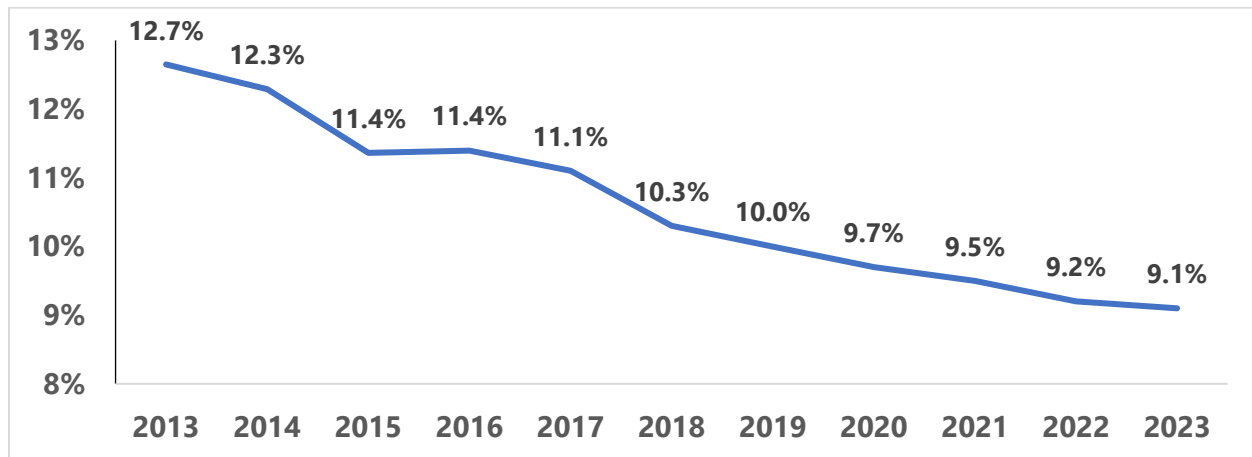
Source: BIA ADVantage, 2019.

Historical Examination of Local Radio's Share in the Syracuse, NY Market

This expected decrease in the advertising share attributable to local radio stations in the Syracuse, NY radio market is a continuation of a recent trend. Figure 3 shows the local radio stations share of local advertising revenue attributable to their over-the-air advertising revenue starting in 2013.

⁴ See 2017 Syracuse Report, p. 5.

Figure 3 - Local Radio Stations' Over-the-Air Advertising Share in the Syracuse, NY Radio Market: 2013-2023



Source: BIA ADVantage, 2019

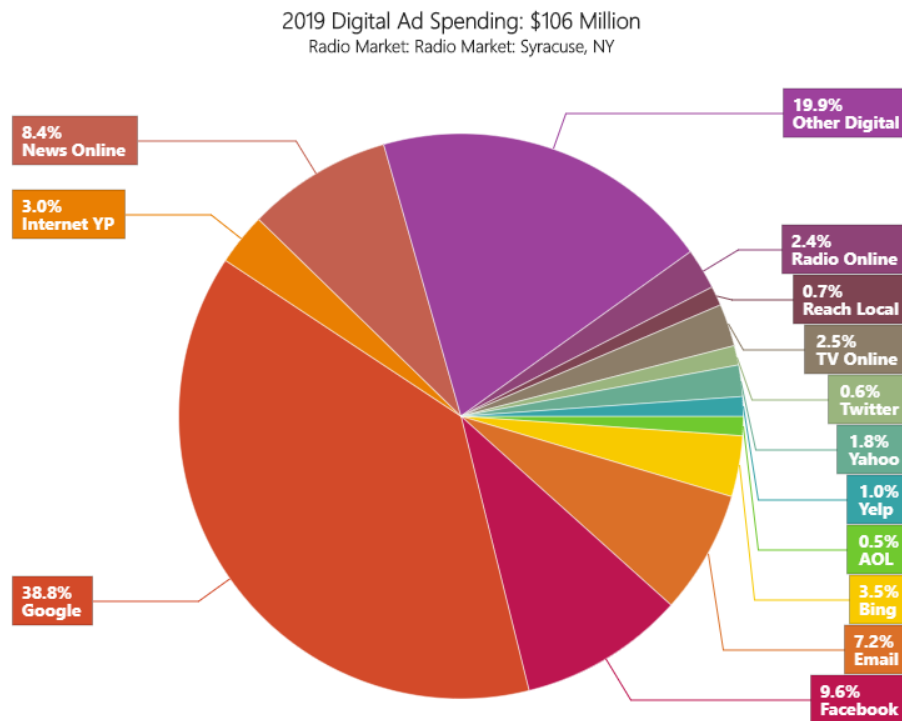
Local radio stations continue to feel the impact of the increased competition they face for both audiences and advertisers. While still an important part of the local advertising market, they are clearly a significantly less potent force in this market. As more of these consumers turn to online sites, as well as mobile apps for news, information, and entertainment, national and local businesses are redirecting their spending. Further, with the continued growth of the popularity in mobile and online properties, we believe that the share going to local radio stations will continue to decrease.

Online Companies in the Syracuse, NY, Market

Turning to this growing segment, many of the online and mobile companies are attracting very large usage nationwide and in many different markets. With this greater usage by consumers, these mobile and online companies are selling advertising targeted to specific local markets. This focus on local markets prompted BIA to start estimating the actual advertising revenue generated by these online and mobile firms that is attributable to each of the local markets. These local data is available in the BIA ADVantage service and is being used by both traditional and online/mobile media companies to assess the local competition.

Figure 4 shows the estimated shares of these online and mobile companies of the total local advertising in the Syracuse, NY radio market for 2019.

Figure 4— Combined Digital (Mobile + Online) Advertising Revenue in the Syracuse, NY Radio Market



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Source: BIA ADVantage, 2019.

As was the case in the 2017 report Google still leads all companies in generating mobile and online advertising revenue, including the local traditional media involved in online activities. The ability to provide the Syracuse, NY radio market with needed news, information, and entertainment has allowed Google to boost their advertising revenue immensely, with an estimated \$41.2 million of revenue in that radio market alone. Other national online companies that also focus on attracting local audiences and selling targeted local advertising, such as Facebook (\$10.2 million), Bing (\$3.8 million) and Yahoo (\$1.9 million), have started to make inroads, turning their increasing usage by local Syracuse, NY consumers into increased revenue.

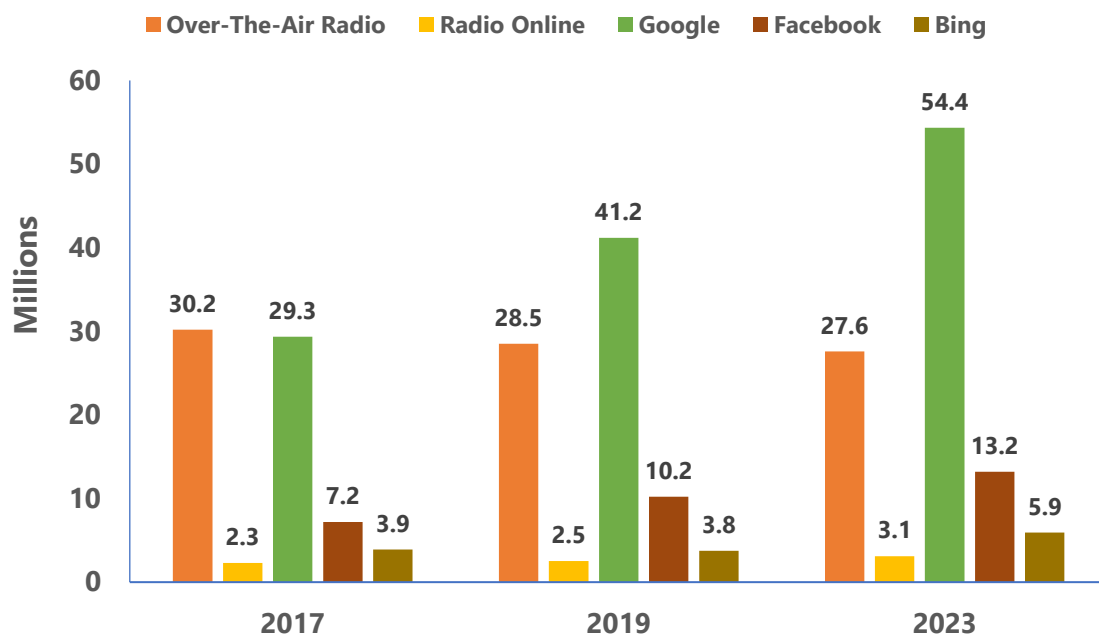
Comparing the data from the previous figures reveal that there has been a significant transformation in the Syracuse market. This comparison can be seen in Table 2 and Figure 5 below.

Table 2 - Comparison of Advertising Revenue Generated by Local Radio Stations and Online Companies in the Syracuse, NY Radio Market

Advertising Platform	2017 Adv. Revs (\$000s)	2017 Adv. Share	2019 Adv. Revs (\$000s)	2019 Adv. Share	2023 Adv. Revs. (\$000s)	2023 Adv. Share
Over-The-Air Radio	30,200	11.4%	28,500	10.0%	27,600	9.1%
Radio Online	2,290	0.8%	2,520	0.9%	3,110	1.0%
Google	29,334	10.8%	41,172	14.4%	54,355	17.9%
Facebook	7,214	2.7%	10,223	3.6%	13,211	4.4%
Bing	3,900	1.4%	3,752	1.3%	5,938	2.0%

Source: BIA ADVantage, 2019

Figure 5 - Comparison of 2017- 2019 Local Radio Advertising with National Online Companies Advertising in the Syracuse Radio Market



The data above for the Syracuse, NY radio market make clear that non-broadcast related Internet and social media are having a significant competitive effect in local markets. Google, by itself, eclipses the total amount generated by all of the local radio stations in the Syracuse radio market. As these local advertising markets begin to trend more toward digital services, and away from traditional media, the competitive posture of companies like Google increase, while the relative competitive position of traditional radio stations decline.

Conclusion

What is occurring in the Syracuse, NY radio market is occurring in markets of different sizes. Local radio stations face new and varied competition to attract audiences and to sell access to those audiences to advertisers. As consumers seek additional sources for news, information and entertainment, local advertisers seeking access to those audiences, have increased their advertising spending with these new platforms. As a result, while local radio stations still remain an important part of the local advertising marketplace, in Syracuse and elsewhere, their position has diminished.

Given the growth and new competitive pressures from digital and social media platforms, government policies designed to restrict common ownership of radio stations in local markets like Syracuse, NY should be reexamined. The data presented above demonstrates that relaxation of the local radio ownership rules is warranted not only in the largest markets, but in small and medium markets as well. The competitive impact of firms such as Google on local advertising markets is especially acute in medium and small markets. Allowing for increased economic efficiencies by expanding local radio market combinations in markets such as Syracuse, NY may be necessary to help ensure the economic vitality of the traditional free, over the air local radio stations. Changing the local ownership rules could help ensure that local radio stations remain an important component of a diverse media marketplace now being shared with an increasingly significant non-broadcast digital and social media sector.

ATTACHMENT C

Declarations of certain Broadcast Licensees

DECLARATION

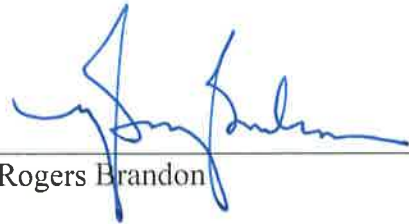
I, L. Rogers Brandon, hereby declare under penalty of perjury that the following statements are true and correct.

1. I am President of American General Media. I am making this Declaration in support of the Joint Reply Comments of Broadcast Licensees filed by my company and other broadcasters in support of comments that the National Association of Broadcasters and certain other parties filed in response to the Commission's Notice of Proposed Rulemaking in its 2018 Quadrennial Review proceeding.

2. I have reviewed the Joint Reply Comments to which this Declaration is attached. The factual information therein regarding broadcast radio stations owned by my company is true and correct to the best of my knowledge.

By: _____

L. Rogers Brandon



Dated: May 29, 2019

DECLARATION

I, Caroline Beasley, hereby declare under penalty of perjury that the following statements are true and correct.

1. I am Chief Executive Officer of Beasley Media Group Licenses, LLC. I am making this Declaration in support of the Joint Reply Comments of Broadcast Licensees filed by my company and other broadcasters in support of comments that the National Association of Broadcasters and certain other parties filed in response to the Commission's Notice of Proposed Rulemaking in its 2018 Quadrennial Review proceeding.

2. I have reviewed the Joint Reply Comments to which this Declaration is attached. The factual information therein regarding broadcast radio stations owned by my company is true and correct to the best of my knowledge.

By: 
Caroline Beasley

Dated: May 29, 2019

Edward N

DECLARATION

I, ~~Eddie~~ Esserman, hereby declare under penalty of perjury that the following statements are true and correct.

1. I am a member of Golden Isles Broadcasting, LLC. I am making this Declaration in support of the Joint Reply Comments of Broadcast Licensees filed by my company and other broadcasters in support of comments that the National Association of Broadcasters and certain other parties filed in response to the Commission's Notice of Proposed Rulemaking in its 2018 Quadrennial Review proceeding.

2. I have reviewed the Joint Reply Comments to which this Declaration is attached. The factual information therein regarding broadcast radio stations owned by my company is true and correct to the best of my knowledge.

By: _____

Eddie Esserman

Edward N.

Dated: May 29, 2019