

VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Esq., Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: 2018 Quadrennial Regulatory Review, MB Docket No. 18-349

Dear Ms. Dortch:

This letter is to report on communications in the above-referenced docket made by W. Lawrence Patrick, a principal of Legend Communications, LLC (“Legend”) to Commissioner Brendan Carr and his Chief of Staff Jamie Susskind, during a visit by the Commissioner to Legend’s radio stations in Cody, Wyoming on May 30, 2019.

During the conversation, Mr. Patrick and some of the Legend employees described to the Commissioner the public service programming done on the stations. Legend explained how they do a three-hour news block on their AM station (also broadcast on its FM translator), as well as a live discussion show from 9-10 a.m. every day, Monday through Friday. Legend also does an hour afternoon news and discussion show as well as an extra two-hour local sports talk show on Friday afternoons. It is currently in the process of expanding its news operation in the market. The music stations also have regular newscasts throughout the day.

By contrast, other stations in the market do little or no local programming. Mr. Patrick accompanied the Commissioner to stations in nearby Powell, Wyoming, which Legend would be interested in acquiring, but it cannot do so because of the limitations of the current ownership rules. Those stations were not manned when visited – the doors were locked, and no lights were on in the building during this visit during normal business hours.

Legend also relayed that Google and Facebook and other digital competitors have been selling to advertisers in the Cody market, resulting in a loss of an estimated \$30-40,000 in monthly billing to the Legend stations. While Legend is now offering its own digital products to advertisers in the market, these companies are competing for its advertising base.

If Legend was able to acquire more stations in the market, it would provide more coverage to three high schools in the area that receive little coverage of their sports and academic activities. With more stations, Legend would open studios in Powell, where there is a local community college, switch the duplicative country station to ESPN and local sports, and possibly do Spanish programming on one of the other stations. The third station could provide more talk programming, Christian AC or some other format. If Legend could own more stations, it would be able to provide more programming diversity to the community. Less ownership regulation would result in the public having more diverse programming choices. Legend would also pledge to expand its news and informational programming.

The Legend principals have suggested to the Commission that the FCC should relax the current local radio ownership rules, as such a relaxation would promote the public interest. The FCC waited to deregulate broadcast-newspaper cross-ownership limits until there was little interest in such combinations given the decline in the newspaper industry. That should not be allowed to happen in radio where radio can still offer much local news, information and other programming focused on the communities that stations serve.

Should there be any questions concerning this matter, please contact the undersigned.

Respectfully Submitted,

/s/ Susan K. Patrick
Susan K. Patrick
Managing Partner
Legend Communications, LLC

cc: Commissioner Brendan Carr
Jamie Susskind, Esq.