

**June 12, 2018**

**Comments to FCC Notice of Inquiry 18-184**

I file these comments to strongly endorse the creation of a new C4 FM class, as proposed by Matthew Wesolowski at SSR Communications. In fact, if 'C4' had been approved and adopted by the FCC when Mr. Wesolowski originally introduced it, five years ago, I believe we would not be facing the controversy that we do, today, between many full-power FM owners and operators, and the applicants and licensees of the secondary-service LPFMs and FM translators that have been and are being tightly wedged onto the FM band.

As for the current debate over the 'C4' proposal, how is it fair or rational policy to give newfound priority to a thousand-plus new secondary-service translators over already-operating primary service, Class A FM stations, whose owners spent hundreds of thousands or millions of dollars to purchase or get their full-power stations on the air? At the FCC, have 'primary' and 'secondary' substantially or entirely lost their respective meanings?

At the time, I was one of those aspiring broadcasters-to-be who would have personally benefited if the C4 FM class had existed. In 2013, I was the winner of a new, Class A allocation in FM Auction 94, at the community of Robert Lee, Texas. Because that community is in a sparsely populated area of west-central Texas, and for 'viable business' reasons, I tried to move the signal into the Abilene market. However, primarily because of the FCC 'rural radio' policy restrictions, I was not able to make that move. I then turned my attention in the other direction, southward, to the San Angelo market. As a Class A, the new FM would barely have put a 'rimshot' or 'fringe' signal into San Angelo. However, if the C4 option would have existed at the time, I would have been able to put a far better and more technically robust signal into San Angelo. I would, today, be a San Angelo market FM broadcaster, with a C4 signal. I ended up selling the Construction Permit, since I did not believe a station would financially succeed at the Robert Lee community.

So, whether it was my situation, back then, or for hundreds of Class A FM owners and operators of today, the option of an FM Class C4 has real-world benefits and meaning. These Class A FM owners are operating in an increasingly competitive business landscape, where an upgrade to Class C4 could well be one option to allow them to better serve their local communities. I wish I had that chance five years ago.

I firmly implore Chairman Pai and the other Commissioners to adopt and implement an FM Class C4, and to restore and maintain the integrity of full-power, primary FM stations over secondary FM services.

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