COMMANDER COMMICATIONS

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Dear FCC Commissioners,

Time is running out for many of us small broadcasters and this proposal will help us survive in a community where the small broadcaster’s needs have been forgotten. I have done many studies and this proposal will not force any low power or translators to go off the air. There seems to be an engineering solution in which all parties can coexist even in the worst case scenarios. The 73.215 portion of RM-11727 only ask the giant broadcasters to cease warehousing of the public spectrum. Even with this proposal, contour protection will continue and only those station involved in a triggering application will be converted to 73.215 stations. This is not a down grade of Class. Their Class of station remains the same. Many of these stations have warehoused this spectrum for over thirty years. This is not in the public interest. The AM translator initiative made many giant broadcasters even larger, yet there seems to be an objection from this very group for the small Class A broadcasters to just give their listeners a decent signal.

Over 700 mostly small and minority stations will benefit from this proposal.  We need help with our terrible signals, just to survive in today's highly competitive marketplace. We are primary stations not secondary stations that need help now.

Many Class A broadcasters are America's last direct contact to the communities we serve, because we live and work in those communities.

I fully support the FM Class C4 / 73.215 petitions for rulemaking filed by MMTC and SSR Communications, MB 18-184. These changes are very much needed for survival of America’s final source of local broadcasters, the Class A operators, and 73.215 no longer serves the public interest in its warehousing of public spectrum.

Sincerely,

Carl Haynes, President

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