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July 5, 2017

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
The Portals Building
445-12th Street, S.W.
Washington, D.C. 20554

Re: Statement of Pamal Broadcasting, Ltd.
Review of Local Radio Ownership Rules – Embedded Radio Markets
MB Dockets No. 09-182 and 14-50

Dear Ms. Dortch:

Pamal Broadcasting, Ltd. (“Pamal”) hereby urges the Commission to change the methodology used in the analysis of multiple ownership compliance for stations located in an “embedded market.” Pamal has for 30 years been a family-owned radio broadcaster. It currently operates stations in medium-to-small markets in the Northeast. Its stations, licensed to its subsidiary 6 Johnson Road Licenses, Inc., include WHUD(FM), Peekskill, WXPB(FM), Briarcliff Manor, and WSPK(FM), Poughkeepsie, all home to the Hudson Valley market, which is embedded in the New York market. While Pamal has an interest in these three stations in the embedded market, it has no ownership interest in any station licensed to any county in the core of the New York market.

Pamal commented at an earlier stage of this proceeding that data strongly support a finding that the embedded markets are economically and demographically independent from each other; that stations in one embedded market do not compete with stations in other embedded markets within the parent market; and that radio revenues in embedded markets are depressed when compared with other similarly sized markets.

Pamal has reviewed the Petition for Reconsideration filed herein by Connoisseur Media, LLC (“Connoisseur”) with respect to the ownership rule treatment of stations in embedded markets. Pamal has also reviewed the Notice of Ex Parte Communication filed by Connoisseur on July 3, 2017 summarizing its counsel’s recent telephone calls on this topic with Alison Nemeth of Chairman Pai’s office and Brendan Holland, Chief of the Industry Analysis Division of the Media Bureau, as well as the letter sent to Chairman Pai today by the CEO of Connoisseur. Pamal joins Connoisseur in urging the Commission to either exempt stations that are home exclusively to an embedded market from the current



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dual multiple ownership analysis or else establish a presumption that an analysis involving the greater parent market is unnecessary if there is an objective showing that a station designated as “home” to an embedded market is not in reality competing with stations home to the core of the parent market. As a similarly situated licensee, Pamal urges the Commission to adopt the proposal made by Connoisseur in any order on reconsideration rather than deferring the issue to a subsequent omnibus review. This is a discrete and noncontroversial matter of substantial import to licensees such as Pamal with stations in embedded markets, yet a matter of no broader consequence.

Respectfully submitted,

PAMAL BROADCASTING, LTD.

By: Laurence M. Miller
Lawrence M. Miller

LMM:c11

cc: Chairman Ajit Pai
Commissioner Michael O’Rielly
Commissioner Mignon Clyburn
Alison Nemeth, Office of Chairman Pai
Matthew Berry, Office of Chairman Pai
Brendan Holland, Media Bureau
Peter Doyle, Media Bureau