

August 1, 2017

**VIA HAND DELIVERY**

Ms. Marlene H. Dortch  
Secretary

Federal Communications Commission

445 12<sup>th</sup> Street, SW

Washington DC 20554

**Re: MB Docket No. 17-105**

Dear Ms. Dortch:

I, Harvey Wells have reviewed the Comments of Shainis & Peltzman, Chartered which were filed in the above-referenced Docket. I am also familiar with the Petition for Rulemaking filed by Geo-Broadcast Solutions, RM No. 11659, which is referenced in the Shainis & Peltzman Comments.

As a radio broadcaster for over 40 years (spending most of my career with CBS radio, working for and running stations in the Chicago and Los Angeles and also Newsweb Radio Company, running a group of Chicago Market simulcast stations), I have witnessed technological advances that have both enhanced and disrupted the way Americans consume media. One thing that has not changed throughout those years is radio's ability to serve its local communities better than any other medium. From emergency news, weather and traffic to interviewing local officials all the way to finding lost pets, no other service benefits local cities and towns better than radio.

Throughout its almost 100-year history, radio has been disrupted. From "Talkies" motion pictures to television to today's mobile Internet devices, radio has managed to continue to find a place in peoples' homes and automobiles. However, it has become increasingly difficult for local radio to continue to thrive, based on its advertiser-based model, without major advances in its own technology. The origination of programming on boosters provides the very technology which will allow radio to continue to play a vital role in consumer listening and business advertising strategies.

As someone who managed a radio group which owned three radio stations which utilized technology similar to the origination of programming on boosters, I have first-hand experience in its benefits. We had to own three separate radio stations as well as buildout a computer system in order to accomplish what different programmed boosters can do with just one radio station. There is no doubt that there are enormous benefits to radio's three consumers; the communities which it serves, the listeners who consume the stations and the businesses who advertise on them. Let me take each consumer, one at-a-time.

**Communities:** Differently programmed boosters will now allow a radio station to focus on opportunities in neighborhoods as opposed to larger citywide events. There will now be far more chances to give attention to organizations that operate in a portion of an area as opposed to the entire area. Local government officials will now have an opportunity to speak with their own constituents. From a Congressman or State Assembly member who may serve only a portion of a radio station's broadcast area to mayors and other government officials, this technology will allow much greater coverage. Local community and emergency information will be far easier distribute and far more germane to the consumer.

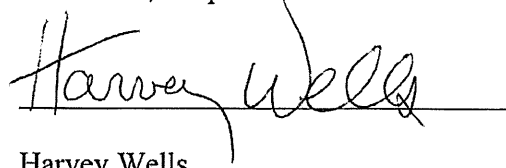
**Listeners:** Today's audio consumer has a myriad of choices. However, radio is the only audio service that is local and can create a bond between the listener and the air personality. Differently programmed boosters allow that bond to deepen by allowing hyper-local content to be aired within each station. News, traffic and weather reports can be micro-targeted to communities within communities. Tornado, flash flood and severe weather general alerts can be brought down to a level never before imagined by a radio station which serves many areas within its city of license. Radio listeners will now be able to hear what is going on in their neighborhood as opposed to the entire city or worse, state or states in which they live.

**Advertising:** It is no secret that new technology has significantly disrupted local radio stations. Radio revenue has continued to decrease over the past several years and the rise of the new technology has been a major reason for this decline. Where once advertising agencies spent large percentages of their budgets in radio, those budgets are now going to other mediums. In many markets, especially the larger ones, advertising agency dollars have accounted for as much as 75-80 percent of the total advertising revenues for radio stations. The correlation of advertising agency business losses to radio station revenue losses is direct. Radio needs to hit the "reset" button and move to what it does best; help local businesses to thrive through localized advertising campaigns. The problem until now is that it has either been too expensive or not geographically logical for a small local business to advertise on a radio station that serves a vast community in which the advertisers' business simply does not serve. For example, there is no way that a single dry cleaner is able to justify spending advertising dollars in an even relatively small market. In larger markets, it's simply impossible. As another example, in a large market, a car dealer may not be able to justify spending its marketing dollars in an area that may be far larger than their own trading area, especially if they have a competitor dealer located in the very same community. Differently programmed boosters will alleviate both of these examples of advertising waste, allowing radio marketers to open a broad array of new business opportunities.

In summary, differently programmed boosters will allow radio to return to its original mission as the place for local news, information, entertainment and a sound advertising investment. I have seen the success that this technology can bring through my own experience. Without implementing this new technology, radio risks the continuation of its slide downward from all three of its consumer groups. However, by using differently programmed boosters, radio will continue to play a vital role in the communities it serves, the listeners who reside in those communities and the businesses that make those communities grow and prosper.

I urge the Commission to take whatever steps it deems appropriate to expeditiously modify Section 74.1231(i) of the Commission's rules, allowing for origination of programming

on booster facilities. As explained in the Shainis & Peltzman Comments, the public interest benefits are significant. I believe that adoption of this minor rule change will allow for a much needed boost for the radio industry, the economy, and not least, the public welfare.

A handwritten signature in cursive script, reading "Harvey Wells", is written over a horizontal line. The signature is fluid and stylized, with the first name "Harvey" and last name "Wells" clearly distinguishable.

Harvey Wells