

Davis Broadcasting, Inc.

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GREGORY A. DAVIS
CHIEF EXECUTIVE OFFICER / PRESIDENT

July 18, 2018

Filed Via ECFS

Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Re: MB Docket No. 18-184

In the Matter of Proposals for a New FM Radio Broadcast Class C4 and to Modify the Requirements for Designating Short-Spaced Assignments

Dear Sir or Madam:

Davis Broadcasting Inc. of Columbus, and Davis Broadcasting of Atlanta, L.L.C. (collectively referred to herein as "Davis"), support the proposal in the above-referenced Notice of Inquiry ("NOI")¹ to create a new class of broadcast radio stations to be designated Class C4.

Davis is a minority-owned broadcaster with six radio stations in the Columbus, Georgia market and three in the Atlanta market.² Davis prides itself on its longstanding service to its local communities, but is often hamstrung by the coverage and penetration issues that can be incumbent on Class A facilities, especially in markets that are geographically expansive. Davis believes that permitting eligible Class A stations to upgrade to the new C4 status would have a strong positive impact on its operations, and on numerous other similarly situated minority-owned broadcasters who struggle with stations that are signal-impaired. Adoption of the proposal will help level the playing field for minority-owned broadcasters and will further the Commission's efforts to increase opportunities for diversity in broadcasting.

Davis encourages the Commission to proceed with due haste to establish the Class C4 service. There can be no doubt that such action would improve the competitiveness of many

¹ *In the Matter of Proposals for a New FM Radio Broadcast Class C4 and to Modify the Requirements for Designating Short-Spaced Assignments*, Notice of Inquiry, FCC 18-69 (rel. June 5, 2018).

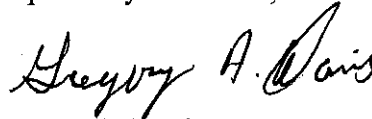
² These include two stations that are identified in SSR Communications Inc.'s Petition for Rulemaking as minority-owned Class A stations eligible to upgrade to the proposed Class C4. See Petition at 17, Exhibit 2.

BDI

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minority-owned broadcasters, thereby allowing these committed broadcasters to better serve their diverse local communities.

Respectfully submitted,

A handwritten signature in black ink, reading "Gregory A. Davis". The signature is written in a cursive style with a large, stylized "G" and "D".

Gregory A. Davis
President