



Blackbelt Broadcasting Inc.
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554
In the matter of

September 6th 2018

Docket 18-184

Amendment of Part 73 of the Commission's Rules to Provide for a New FM Radio Broadcast Class C4 and to Modify the Requirements for Designating Short-Spaced Assignments, Order and Notice of Proposed Rule Making

MB 18-184 Reply Comments

In 2013, Blackbelt Broadcasting Inc. Licensee WLYB(FM) Livingston AL. provided broadcast service in a community that didn't have a local radio station.

Our permit was part of an early FCC auction.

When we visited Sumter County, Ala., one of the poorest counties in the nation, we saw a opportunity to serve this community; we were willing to invest in it and take the risk.

Growth has been slow. Many small businesses struggle (and close) month to month. Livingston, Ala., doesn't have a car dealership, furniture store, hospital or many other businesses that are vital to a community.

Nearby York, Ala., has a hospital that has been on the brink of closure. The local grocery store closed over a year ago, and you'll find only one fast food restaurant. With the exception of an insurance agency and a hardware store, downtown business is nonexistent.

Rural internet service is poor. Radio is still a primary source of community information.

WLYB(FM) stays on the air by reaching out to many rural communities, but a lack of a full-strength signal has been a issue. Many communities were abandoned by their station (COL) because they fled to serve large markets years ago, but we are there for community events, and promote small towns that wouldn't otherwise have a voice.

Many residents travel to communities several miles away. In some cases, we share information about community services that are important to the health and well being of our residents — services that many wouldn't know about if it weren't for our station.

Signal and reception challenges had been a hindrance for us. Tropospheric ducting, a limited signal (3.4 kW), and limited tower choices all have been issues.

The listener doesn't understand why some days they can hear us and other days they can't. We have lost a few advertisers due to signal issues. With a limited amount of business and services available, this has been devastating blow to our operation.

Hundreds of other stations also face this challenge. They are limited because of FCC rules that are now outdated. It is time to save many small market stations and implement the C4 Class.

Our station will not bump a translator(s) off the air, interfere with any LPFMs or take revenue or market share from our larger competitors. What it would do is allow us to serve all of our surrounding communities — and yes, serve the public interest.

Many Class A stations are at a crossroads. The C4 Class will allow many stations to continue serving small communities, where radio is still a vital part of everyday life.

We respectfully request that you enact the proposed C4 class that is supported by most in this notice of inquiry, and relieve the burden that is being experienced by many small, local, broadcasters.

Sincerely,

Damon Collins
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