

**COMMENTS REGARDING APRIL 28, 2020 AUCTION  
AU DOCKET NO. 19-290, DA 19-1027  
AND ALLOCATION DELETION REQUEST (11/5/2019)**

**FROM: ELIJAH MONDY**

**November 5, 2019**

On June 30, 2003 the Commission adopted Docket No. 03-141 and released on July 1, 2003. This was regarding a petition for rulemaking which was filed by WKJF Radio, Inc., licensee of Station WKJF-FM, Cadillac, Michigan, proposing the deletion of Channel 227A at Glen Arbor, Michigan. The removal of Channel 227A at Glen Arbor would allow Station WKJF-FM to relocate its transmitter.

The table of allotments under Michigan was amended by the Commission removing channel 227A at Glen Arbor. The petition was granted so that WKJF-FM could relocate its transmitter.

Likewise, I am filing this petition, with a twofold request, asking the commission to remove from the scheduled April 28, 2020 auction and delete channel 233A at Bruce, Mississippi.

***Background & Reason:***

I was granted a construction permit to upgrade channel 233 at Helena, Arkansas from a class C3 to class C2. That construction has been completed and licensed. However, the coverage pattern had to have a null in it toward "same channel" 233A at Bruce, Mississippi which is south east.

Because of that current pattern with the null I have received complaints from listeners in a certain area of our coverage of what is called "picket fencing" noise in the signal.

Our antenna engineers have evaluated and said with the elimination of the null at Bruce, Mississippi a pattern could be developed that would eliminate this problem. This is why I am asking that the 233A allocation at Bruce be deleted so that I can even better serve our listeners. The allocation of Bruce, MS allowed it to go on the air about February 22, 1994.

Since 2006 the allocation at Bruce Mississippi has been dark or silent for many years. This silence has not brought any concerns from the community of license nor the public.

The decreasing population of Bruce, Mississippi according to the latest census is now 1,847. It is a small town with a lacking economy.

I had become acquainted and communicated with the original owners. Because of certain problems they sold the station in 2006.

The group that purchased the station inherited some problems operating the station and there were periods of silence. Some of these periods of silence were not reported to the FCC. That group also later sold it to another group. This second group also had problems and the station was off the air much of the time.

During that time, it was reported to me that the land owners who leased the land where the tower was located had some serious family issues and decided for some reason that they did not want a tower on their property anymore. The station was already dark and this further complicated matter.

In communicating with the license holder, I was told they decided to give up because of so many impossible situations. Therefore, on May 4, 2012 the station surrendered its license to the Federal Communications Commission. They took a big lost, but it was not worth it to invest more money and get the station operating again. The station's license was cancelled, and its call sign deleted from the FCC's database on May 24, 2012. The concern always had been the economics and it was not there to sufficiently support the station.

For 13 years the allocation had been mostly dark and had not even been put on the auction block since the license was surrendered in 2012. There have been two FM broadcast auctions #94, April 23, 2013 and #98, July 23, 2015 and Bruce was not included in those auctions; this was not fair. It is my understanding after 2 auctions an allocation can be deleted. This failure created a lost opportunity.

Not only that, according to my observation, there has been no interest or complaints from that small community about the Bruce allocation being dark and the license being handed back to the FCC.

I "do not" believe by putting channel 233A at Bruce, Mississippi on the coming auction block will serve the public interest and it only ties up what else can done better to serve the public interest which is what I am trying to do.

The history of channel 233A at Bruce, Mississippi with three owners since 2006 has been unsuccessful in sustaining the operation of the station because of too many poor circumstances and this tend to demonstrate that it is going to be a big challenge for someone to pay out a lot of money in an auction, find land to purchase or lease,



construct a new tower and studio, and have a good economic environment in the city of Bruce to support the station.

It is interesting that our neighbors to the north, The Canada Radio and Television Council ("CTRC") requires a study of economic viability for each radio allocation. As we understand it, this study considers whether the station had enough businesses to support it. If such a study was in a town of the size of Bruce, Mississippi it would likely fail.

Nevertheless, if for whatever reason the economy and population turn around for the city of Bruce and someone is very interested, then at that time someone can have a study done to put in an allocation whether LP or Full class. According to Radio Locator there are 19 FM stations and 10 AM stations with a strong, moderate or weak signal coming into the 1,847-small population of Bruce, Mississippi that can serve it.

The failures, silence of the station and lack of interest since 2006 has tied up and impacted what others can presently do. Again, this is the reason why I am making my request.

Because of the above and my desire to fix a problem that I have so that I can better serve with a better signal, I am asking the Commission to do, as it did in 2003 for WKJF Radio, Inc., to remove channel 233A, at Bruce, Mississippi from the coming auction and delete this allocation which too long has not served.

I believe the Commission has much discretion and ability regarding its rules, policies and can make changes to help not only the community but also broadcasters, such as you did for WKJF Radio, Inc. in 2003.

I beg you to please with expedition grant my request. Thank you.

Sincerely

A handwritten signature in black ink that reads "Elijah Mondy". The signature is written in a cursive style with a horizontal line underneath the name.

Elijah Mondy

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