KDKK-FM KPRM-AM

MUSIC FOR ADULTS TOP 40 COUNTRY

100,000 WATTS ON 97.5 MHZ 25,000 WATTS ON 870 KHZ

De La Hunt Broadcasting - Box 49 Park Rapids, MN 56470 - Phone: 218-732-3306 Fax: 218-732-3307

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

1-10-98

Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)
	)
Implementation of Section 309(j) of the Communications Act --Competitive Bidding for Commercial Broadcast and Instructional Television Fixed Service Licenses	) MM Docket No. 97-234
	)
Reexamination of the Policy Statement on Comparative Broadcast Hearings	) GC Docket No. 92-52
	)
Proposals to Reform the Commission's Comparative Hearing Process to Expedite the Resolution of Cases	) GEN Docket No. 90-264

Forward: De La Hunt Broadcasting Corporation, P. O. Box 49
Park Rapids, Minnesota 56470

The De La Hunt Broadcasting Corporation, whose main principal is Edward Patrick De La Hunt Sr. has been in the Broadcasting field for close to 45 years. Mr. De La Hunt began his career as an engineering aide in the manufacturing of Radio and Television receivers with the Setchel Carlson Television Company. His first active career in Broadcasting was with the Franklin Broadcasting Company at WMIN Radio in St. Paul. He then moved to KTRF Radio at Thief River Falls where he further pursued on air and engineering as a career. He left Thief River Falls and moved to Sheldon, Iowa where he constructed, engineered, sold advertising, and did on air broadcasting. He moved to Brainerd, Minnesota in the fall of 1962 after a brief tour of active duty with the Air Force as a Communications Specialist with the Strategic Air Command at Offutt Air Force Base in Omaha, Nebraska.

(cOnt)

Upon completion of his duties at Brainerd, Minnesota, which included engineering, sales, and on air work, Mr. De La Hunt and his family moved to Park Rapids, Minnesota, built, owned and operated KPRM Radio, adding FM in 1966, built and operated KEHG Radio AM and FM at Fosston, Minnesota. Built and operated KLLR Radio at Walker, Minnesota and has since divested his interest in Fosston and Walker due to FCC duopoly rules which were in place at the time, as De La Hunt Broadcasting changed frequency at Park Rapids and increased its power. Mr. De La Hunt feels well qualified to present these proposals to the Commission as in his own words, "I've seen it all".

COMMENTS

(1) It is appropriate to treat those that filed prior to July 1, 1997 separately. However, it should be noted that those applications filed were filed under the Comparative Hearing process. To relegate those applications to a "who has the most money" scenerio is not only inappropriate under the rules, but destroys any opportunity for young qualified, but less affluent applicants to ever share in the American dream of owning and operating a Broadcast property. It also compromises the ability of minorities and women as well as first time owners to participate as the auction process strictly offers the advantage to the rich.

(2) With regard to single applications where no competitive applications were filed: It is totally inappropriate to re-open windows just because only one applicant filed. The stability of the entire industry is at stake and one can only envision the Commissions next step would be to open all renewal filings to a window. A "licensee" that is serving his/her community well should not be subject to this possible threat hanging over his/her head.

(3) In response to settlements this is an appropriate way to settle some cases, but once again only those that have money to burn will prevail and that process once again trashes the American dream. In any event the 180 day time period to settle in which time the rules of auction are not known leaves many unanswered questions by the applicants. The rules should be out and decided upon before the settlement window closes.

(4) With regard to the so called "White Knight" settlements: This should not be allowed as all it furthers is the rich guys win and the poor guys loose.

(5) In case designated for hearing this process should go forward. It is apparent to this commentator that even with the hearing process flaws, it is infinitely better in terms of identifying the mose qualified Broadcaster, not just the most financially able.

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(6) I find it incredable that the Commission would even consider opening a window for existing AM facilities when they seek to upgrade or improve their licensed facilities. This chilling effect is detremental to the Public Interest, as many stations that may, "without interference", improve their facilities will fail to seek such improvement out of fear of launching a full scale war for the improvement. The public will be the loser. The current system that notifies, affected stations of possible interference is more than appropriate. If a complaint developes over a proposed technical improvement it will have to stand on its technical merits which are certainly not challengable by anything other than Technical fact. I strongly oppose this section.

(7) With regard to bidding credits I feel that process can also be flawed. Some of the most substantial companies in our rural area are rural phone companies. Why should they get a break? I am also totally confused when the mission is to get the most money for the frequency, why all of a sudden there is this great concern over small business, minorities, and women? I support the moral concept of supporting the American dream, but you take it away initially with the highest bidder process and then make a feeble attempt to neutralize the effect of auction with this after thought.

In conclusion....I point out that over my 45 years in this business in the last 15 years it appears the Commission has sought with great zeal to destroy the finest Broadcasting System in the world. Broadcasters that are truly Broadcasters have again and again demonstrated their unselfish service to their communities in time of disaster and in good times as well as offering their facilities to Government officials and politicians without charge to keep the public informed. The recent rules and changes have driven many public interest Broadcasters out and have opened the door to financially motivated interest only. The business has been decimated by uninformed decisions generated by many who have never had to make a payroll or who have never left the warmth and comfort of their home on a -30 below zero night to fix a technical problem, or fill in for a sick employee. Everything was truly going just fine until someone had to, TINKER, TINKER, TINKER! None of the small Broadcasters were getting rich but they sure the "hell" felt good about serving their communities. They were and some still are meeting and excelling at the Public Interest Test.

It is imparative that the Commission , in the Public Interest, revisit the following issues.

1. First applicant that seeks frequency and or discovers its availability should be able to apply and receive same.

2. A comparative process acceptable to the courts be implemented so we can be assured the best applicant, not the richest, is selected.

3. Once a Broadcaster demonstrates and continues to demonstrate his/her public service interest in his/her community he/she should not be subjected to continuous threats to his/her license.

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4. The auction process may be fine for some services but certainly not for the Broadcast field that is so deeply involved in the Community day to day welfare. It does not assure or even attempt to assertain whether the proposed licensee will be a detriment or a credit to the Community.

The preceeding comments are respectfully submitted by the De La Hunt Broadcasting Corporation for inclusion in the prospective rule making that is before the Federal Communication Commission. The proposer submits that he is willing to come and appear before the Commission to answer questions or testify in all aspects of this proceeding.

Submitted by,

Carol De La Hunt

Secretary for De La Hunt Broadcasting Corporation on behalf of President and General Manager E. P. De La Hunt Sr.