

COMMENTS ON FCC DOCKET No. 14-127

By Grant Co. Broadcasters, Inc. licensee of station WNKR, Williamstown, Kentucky

The Federal Communications Commission, essentially ignoring most of the concerns associated with electronic public file requirements for radio broadcasters, has decided to forge ahead in this area. There is no doubt that this is a very real hardship for any radio broadcaster that is small. To us, there can be little argument that complying with this requirement will consume scarce resources in small stations that could be deployed for far more public benefit in other areas. There can be little argument that many of these facilities lack the funds, personnel or internet connections needed to comply without extreme hardship. This will impact single station, independent owners like us disproportionately. Group owners can spread the cost of compliance over multiple markets and/or stations, making compliance far less of a financial issue.

Certainly, the Commission should permanently exempt small stations from this. However, restricting the exemption to stations with five or fewer full-time employees is not enough. Fulltime employment is defined as 30- not 40- hours per week by the Commission. This despite the fact that, in the private sector, 40 hours has been the traditional benchmark for what fulltime work is. Therefore, in view of the Commission's definition of fulltime we feel exempting stations with fewer than 10 Commission-defined fulltime employees is warranted under this PRM.

We also respectfully request that the Commission, at some point in the future, reconsider the entire public file concept. Our station has operated continuously since April of 1992. In just a couple of months we begin our 23<sup>rd</sup> year of service to our area. In that time, no member of the public has ever requested to see the file. It has been looked at by FCC inspectors and inspectors from our state broadcasting association to ensure compliance by us, but nobody from the community has asked to see it in 23 years.

During this time, we have attended numerous seminars on public file maintenance and they all begin with the same fact- most public file requests come from organized activist groups and from disgruntled former employees. It seems to us that, at some point, the Commission needs to seriously consider if this requirement is wanted or needed by a public that seems remarkably disinterested or if it is serving its intended purpose.

It also seems to us that the intended conversion by the Commission to electronic public files should result in the reconsideration of the "main studio" rules. The current rules are requirements that were intended to be enforced uniformly. Instead, the current enforcement makes it difficult for commercial broadcasters to get exemptions, but relatively easy for non-commercial broadcasters. In some cases, blanket waivers have been issued to non-commercial operators covering hundreds of local stations they own or operate. The current "25 mile radius" requirement was imposed largely to allow members of the public that actually reside in the city

of license of any given station easy access to the station's studios and the public file(s) contained therein. Certainly, the conversion to electronic files will render this issue moot as the public will no longer have to visit the studio facility to access the file(s).

There are many stations paying rents that are higher than they could get outside the current mileage limit or that have been forced into locations less desirable for the conduct of their daily business, or that have been forced to engineer around terrain issues for STL paths that could have been eliminated by locating outside the radius. Eliminating this rule for stations- either required to create electronic public files or that voluntarily do so- would allow them to make decisions on studio location based on market conditions, their budgets and their technical requirements. It would create no hardship on the public. It would also finally level the playing field in this area for all broadcasters- large and small, commercial and non-commercial.

Respectfully submitted,

Jeffrey K. Ziesmann  
Robert R. Wallace  
Grant County Broadcasters, Inc.  
Radio Station WNKR  
Williamstown, Kentucky