



May 29, 2011

To the FCC,

With over forty four years in the Commercial Radio Industry, I believe I have developed a unique vantage point from which to speak.

Starting out in 1971 as a Radio Announcer at WKLK-AM (1KW-D) and currently the licensee of two AM and two FM stations licensed to Red Wing (KWNG-FM, Class C-3) and KCUE-AM (1250Khz, 1KW-D/.0086 KW-N), Lake City (KLCH-FM (Class A, 6KW) and WBHA-AM (1190Khz, 1KW-D with a 150 Watt Translator on 99.7Mhz), all stations in Minnesota. To further enhance my perspective I have been the licensee of over twenty Radio Stations in Minnesota and Wisconsin. During this time I have seen Radio evolve from the time when AM was the dominant player and even daytime only AM stations garnered large audiences to its present state.

As we fast forward to the present time, with the constant migration from the AM band to the FM band, we find that AM stations, particularly relatively low power, small market stations have been left out in the cold in the media world of today. The expansion of stations on the FM band under FCC Docket 80-90 provided more competition on the dial, the advent of XM Sirius and the multitude of Internet Applications have added to the current situation and problems faced by AM stations. I'm not whining, I'm ready to compete against all comers with the knowledge that our commitment to the local communities we serve, can carry the day. That said, an FM Translator for our Small Market AM stations would allow us to do an even better job, 24 hours a day.

As a small market community licensee I know the meaning of the phrase "Super Serve" when it comes to serving the public in our markets. It is our stated goal to be super involved within the fabric of the communities we serve. It is our mission and our purpose to go to work every day focused on the best interests of our local community. Simply stated if it's important to the communities we serve it's important to us and you will find us there.

I have firsthand experience trying to serve a small market with an AM Daytime-only station and then with the addition of an FM Translator. In 2011 our company revived a silent AM Station in Wabasha, Minnesota, a community with zero local broadcast service.

WBHA-AM (1190 Khz, 1KW-D) is a daytime only station with pre and post sunrise/sunset authority of just two hours. After an investment by Q Media Group of \$74,000 to bring the station on the air we did our best to serve the community. However, we were unsuccessful

in making the station work because of unsustainable cash flow losses. We didn't want to abandon the market but instead went about trying to find an FM Translator, which we did in 2013. It has made a tremendous difference. We invested another \$121,000 into the community in the form of \$75,000 for the permit and the balance in equipment, installation, legal and application fees. We could now broadcast local sporting events, even community parades as well as local emergencies including weather emergencies that take place at night or early morning. As we go about our business in Wabasha, we now hear our station being listened to in local retail businesses. Our telephone response from the community continues to grow. We can feel the difference and see the difference as position versus our competitors continues to slowly improve. Make no mistake – without the translator WBHA-AM would not exist and the Wabasha market would have no local service at all. With the translator we are able to provide local Radio service twenty four hours a day.

Unfortunately, it has been impossible to find a translator for our other AM station, KCUE in Red Wing, Minnesota. We have tried to find one, we have hired outside consultants to search for availability but have been stymied on all fronts. There are simply no FM translators located close enough to Red Wing to move in. All of them are either being used and not for sale at any price. We have been waiting for the FCC to open a window for AM stations to obtain translators and are very concerned that the FCC may be backing off the filing window it proposed over a year ago. If the FCC were to open a window, particularly in rural underserved markets, our communities would be better served. The people who live and work in the community would have another local voice on the FM Band.

I have proven that I am willing to make the investment if only the FCC would allow us to apply for FM translators for our AM stations. This move only makes sense if our mission of serving the public interest, convenience and necessity is to be truly fulfilled.

Respectfully,



Alan R. Quarnstrom
President

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