

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

Chief, Fee Section
Room 452

April 9, 1998

OFFICE OF
MANAGING DIRECTOR

Larry D. Perry, Esquire
11464 Saga Lane
Knoxville, TN 37931-2819

Re: Request for Waiver of the Regulatory
Fee
Radio Station WTNB
Fee Control # 9709158835319002
Fee Paid: \$200

Dear Mr. Perry:

This is in response to the request for waiver and reduction of the Fiscal Year 1997 regulatory fee filed on behalf of AM Radio Station WTNB, Farragut, Tennessee, licensed to 670 Inc. WTNB was assessed a regulatory fee of \$1,200 for coverage of over 761,000 people as a Class D AM Station. You submitted a fee payment of \$200. WTNB's principals argue that they cannot afford the full fee, that they operate the station with one part-time employee, and that they sell few commercials and operate at a loss. In support of the request, you included a copy of 670 Inc.'s 1996 Income Tax Return.

In establishing its regulatory fee program, the Commission recognized that in certain instances payment of a regulatory fee may impose an undue financial hardship upon a licensee. Thus, the Commission decided to grant waivers or reductions of its regulatory fees in those instances where a "petitioner presents a compelling case of financial hardship." Implementation of section 9 of the Communications Act, 9 FCC Rcd 5333, 5346 (1994).

In determining whether a licensee has established a compelling case of financial hardship, the Commission relies upon the regulatee's cash flow, as opposed to the entity's profits. Although deductions for amortization and depreciation, which do not affect cash flow, and payments to principals, reduce gross income for tax purposes, those deductions represent money which is available to pay the regulatory fee.

The tax return indicates that WTNB made a small profit. The station's positive cash flow was further enhanced by a deduction for depreciation. Under these circumstances 670 Inc. has not established a compelling case of financial hardship.

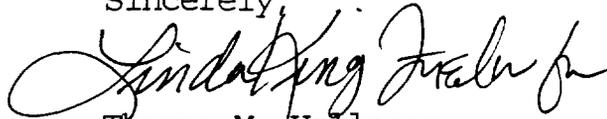
Accordingly, the \$1,000 unpaid balance of the FY 1997 regulatory fee is now due. That fee should be filed together with a Form FCC 159 (copy enclosed) within 30 days from the date of this letter.

Mr. Perry

Page 2

If you have any questions concerning the regulatory fees, please call the Chief, Fee Section, at (202) 418-1995.

Sincerely,

A handwritten signature in cursive script, appearing to read "Thomas M. Holleran".

Thomas M. Holleran
Acting Associate Managing
Director for Operations

Enclosure

Larry D. Perry

11464 Saga Lane • Knoxville, TN 37931-2819 • Telephone (423) 927-8474 • Fax (423) 927-4912

September 1, 1997

Secretary
Federal Communications Commission
Washington, D.C. 20554

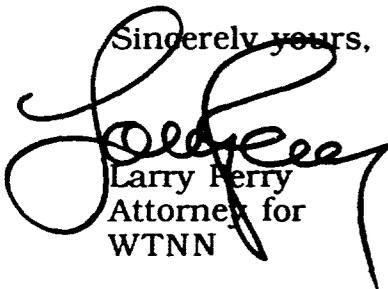
**RE: WTNN (AM)--FARRAGUT, TENNESSEE--REGULATORY FEE WAIVER
REQUEST**

Good Morning:

Enclosed please FCC Form 159 and a check in the amount of \$200 herewith filed on behalf of 670, Inc. (WTNN) licensee of AM broadcast station WTNN located in Farragut Tennessee. Note that the \$200 amount and the attached form includes a Waiver of Regulatory Fee request.

Should you have any questions concerning this matter, please don't hesitate to contact this office.

Sincerely yours,


Larry Perry
Attorney for
WTNN

cc: Mr. Ken Crosthwait, WTNN

LP/eb

REGULATORY FEE WAIVER REQUEST

September 1, 1997

Secretary
Federal Communications Commission
Washington, D.C.

Dear Mr. Secretary:

WTNN operates a small AM station in Farragut Tennessee a little west of Knoxville, Tennessee. The station is operated in the Public Interest with a large portion of its broadcast time being devoted to Public Service Announcements and Public Affairs programs. We sell very few commercials and consequently operate at a loss.

My wife and I and one part time person run the station to save money and really haven't taken any money out of the operation in some time. We are both retired and use the station to provide our listeners with programs that are not heard on some of the larger stations that broadcast from over in Knoxville.

We want to pay our fair share of the regulatory fee, but we simply can't afford a large fee. Therefore, we are paying the best we can at the present, \$200 as in Group 10 along with this request.

To show the Commission that we are operating in the red, if you include any salaries, I am attaching a copy of our tax return for last year. On December 31, 1996, we had exactly \$50.00 in the bank.

In any event, I would appreciate your consideration for this waiver request and I will be happy to answer any question that you or your staff may have.

Thank you for your time and consideration.

Sincerely yours,
670, Inc. WTNN


Kenneth Crosthwait
President

Payment Transactions Detail Report

Date: 10/16/97

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Account Number	Received Date
9709158835319002	WTNN	FCC2000504	09/15/97

13206 BUTTERMILK RD

KNOXVILLE TN 37932

Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$200.00	\$200.00	1	MGJ7	1	WTNNAM	670 INC WTNN	37932		\$200.00	1	PMT
Total									\$200.00		

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

Chief Fee Section
Room 452

April 17, 1998

OFFICE OF
MANAGING DIRECTOR

Kevin P. Latek, Esquire
Dow, Lohnes & Albertson
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036-6802

Re: Fee Control # 9712308350308002

Dear Mr. Latek:

This will respond to your request for refund of the fees submitted on behalf of American Radio Systems License Corp. ("ARSLC"), licensee of WMYF(AM), Exeter, New Hampshire, and WZNN(AM), Rochester, New Hampshire, in connection with the supplement it filed to the stations' assignment application.

The Commission's rules do not specify a fee for a supplement or amendment to an assignment application. Indeed, section 1.1109(d) of the Commission's rules, 47 C.F.R. § 1.1109(d) provides that an additional fee will not be assessed when an application is resubmitted with additional or corrected information, "unless the additional information results in an increase of the original fee amount." Because the supplement or amendment did not result in an increase in the original fee amount (i.e., did not require a long form assignment application to supplement a previously filed short form assignment application), an additional fee was not required. Cf. Fee Decisions of the Managing Director (PBR Communications Systems, Inc.), 6 FCC Rcd 7057, 7076 (1991). Under the circumstances, refund of the filing fee is appropriate. See 47 C.F.R. § 1.1113(a)(1).

Accordingly, your request is granted. A check, made payable to the maker of the original check and drawn in the amount of \$1,380.00, will be sent to you at the earliest practicable time. If you have any questions concerning this refund, please contact the Chief, Fee Section, at (202) 418-1995.

Sincerely,

W. Lewis Fore

Thomas M. Holleran
Acting Associate Managing
Director for Operations

9712308350308002

DOW, LOHNES & ALBERTSON, PLLC
ATTORNEYS AT LAW

ORIGINAL

KEVIN P. LATEK
DIRECT DIAL 202-776-2594
klatek@dlalaw.com

WASHINGTON, D.C.
1200 NEW HAMPSHIRE AVENUE, N.W. · SUITE 800 · WASHINGTON, D.C. 20036-6802
TELEPHONE 202-776-2000 · FACSIMILE 202-776-2222

ONE RAVINIA DRIVE · SUITE 1600
ATLANTA, GEORGIA 30346-2108
TELEPHONE 770-901-8800
FACSIMILE 770-901-8874

February 13, 1998

RECEIVED

FEB 13 1998

VIA HAND DELIVERY

Mr. Andrew S. Fishel
Managing Director
Federal Communications Commission
1919 M Street, N.W., Room 852
Washington, DC 20544

Federal Communications Commission
Office of Secretary

ATTN: Stop Code 1100

Re: WMYF(AM), Exeter, New Hampshire
WZNN(AM), Rochester, New Hampshire
Request for Refund of Fee Tendered in Connection with
Amendment to Application for Assignment of License

Dear Mr. Fishel:

On behalf of **American Radio Systems License Corp. ("ARSLC")**, we hereby request a refund of a filing fee submitted in connection with a minor amendment filed December 29, 1997 to supplement the application for the assignment of the licenses for WMYF(AM), Exeter, New Hampshire, and WZNN(AM), Rochester, New Hampshire, from ARSLC to Capstar Broadcasting Partners, Inc. (See FCC File Nos. BAL-971128GI and BAL-971128GJ, respectively).

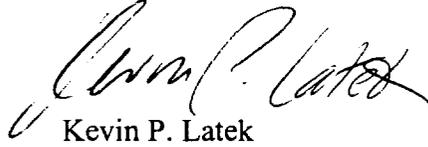
On October 24, 1997, the shareholders of American Radio Systems Corporation ("American"), the corporate parent of ARSLC, filed an application seeking FCC consent to a transfer of control of American to CBS Corporation (formerly, Westinghouse Electric Corp.) ("CBS"). (See FCC File Nos. BTC-971024A1 *et seq.*) On December 29, 1997, ARSLC filed a minor amendment to the above-referenced application that reflected the proposed transfer.

Despite the minor nature of the amendment, however, the filing inadvertently included a check drawn on the account of Infinity Broadcasting Corporation's check (number 970002221) and made payable to the FCC in the amount of \$1,380.00. (A copy of this check is enclosed.) Because filing fees are not charged for the submission of minor amendments, we request that the Commission provide a full refund of the erroneously tendered fee by issuing a check made payable to "Infinity Broadcasting, Inc." in the amount of \$1,380.00. We will then forward the check to Infinity Broadcasting, Inc. upon receipt.

Mr. Andrew S. Fishel
February 13, 1998
Page 2

Thank you for your attention to this matter. Please direct any questions regarding this request to me at (202) 776-2594.

Very truly yours,



Kevin P. Latek

Enclosure

cc: Nancy L. Wolf, Esquire
Michael B. Milsom, Esquire

Payment Transactions Detail Report

Date: 3/17/98

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Account Number	Received Date
9712308350308002	INFINITY BROADCASTING CORPORAT 1200 NEW HAMPSHIRE AVE NW SUITE 800 WASHINGTON DC 20036	FCC2050598	12/29/97

Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$1,380.00	\$1,380.00	1	MPR	1	WMYFAM	AMERICAN RADIO SYSTEMS CORPORA	02116		\$690.00	1	PMT
\$1,380.00	\$1,380.00	2	MPR	1	WZNNAM	AMERICAN RADIO SYSTEMS CORPORA	02116		\$690.00	1	PMT
Total	2								\$1,380.00		

Chief, Fee Section
Room 452

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

April 9, 1998

OFFICE OF
MANAGING DIRECTOR

Christine J. Newcomb, Esquire
Dow, Lohnes & Albertson
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036-6802

Re: Fee Control # 9802268195050003

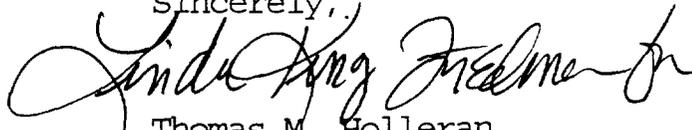
Dear Ms. Newcomb:

This will respond to your request for refund of the fee filed on behalf of ARS Acquisition II, Inc. ("ARS II"), licensee of KKMJ-FM, Austin, Texas, in connection with its amendment to the station's pending minor modification application.

The Commission's rules do not specify a fee for an amendment to a minor modification application. Indeed, section 1.1109(d) of the Commission's rules, 47 C.F.R. § 1.1109(d) provides an additional fee will not be assessed when an application is resubmitted with additional or corrected information, "unless the additional information results in an increase of the original fee amount." Because the amendment did not result in an increase in the original fee amount (i.e., did not transform the minor modification application into a major modification application), an additional fee was not required. See Fee Decisions of the Managing Director (PBR Communications Systems, Inc.), 6 FCC Rcd 7057, 7076 (1991). Under the circumstances, refund of the filing fee is appropriate. See 47 C.F.R. § 1.1113(a)(1).

Accordingly, your request is granted. A check, made payable to the maker of the original check and drawn in the amount of \$690.00, will be sent to you at the earliest practicable time. If you have any questions concerning this refund, please contact the Chief, Fee Section, at (202) 418-1995.

Sincerely,



Thomas M. Holleran
Acting Associate Managing
Director for Operations

9802268195050003

DOW, LOHNES & ALBERTSON, PLLC
ATTORNEYS AT LAW

ORIGINAL

Holly

CHRISTINE J. NEWCOMB
DIRECT DIAL 202-776-2732
cnewcomb@dlsaw.com

WASHINGTON, D.C.

1200 NEW HAMPSHIRE AVENUE, N.W. · SUITE 800 · WASHINGTON, D.C. 20036-6802
TELEPHONE 202-776-2000 · FACSIMILE 202-776-2222

ONE RAVINIA DRIVE · SUITE 1600
ATLANTA, GEORGIA 30346-2108
TELEPHONE 770-901-8800
FACSIMILE 770-901-8874

March 11, 1998

VIA HAND DELIVERY

Mr. Andrew S. Fishel
Managing Director
Federal Communications Commission
1919 M Street, N.W., Room 852
Washington, D.C. 20544

RECEIVED
MAR 11 1998
FEDERAL COMMUNICATIONS COMMISSION
Office of Secretary
FEEES SECTION
MAR 11 2 11 PM '98

ATTN: Stop Code 1100

Re: KKMJ-FM, Austin, Texas
Request for Refund of Fee Tendered in Connection with
Amendment to Minor Modification Application

Dear Mr. Fishel:

On behalf of ARS Acquisition II, Inc. ("ARS II"), licensee of KKMJ-FM, Austin, Texas, we hereby request a refund of a filing fee submitted on February 25, 1998, in connection with the amendment to the station's pending minor modification application.

Because this was an amendment to a minor modification application, no filing fee was required. Despite this fact, a check (number 69743) drawn on the account of Dow, Lohnes & Albertson and made payable to the Federal Communications Commission in the amount of \$690.00 was inadvertently enclosed with this application. (A copy of this check is enclosed.) As a result, we request that the Commission provide a full refund of the erroneously submitted fee by issuing a check made payable to "Dow, Lohnes & Albertson" in the amount of \$690.00.

Please let me know if you have any questions regarding this matter.

Sincerely yours,
Christine J. Newcomb
Christine J. Newcomb*

Enclosure

cc: Michael B. Milsom, Esquire (by ARS Pouch)
Kevin P. Latek, Esquire

*Admitted in Maryland

Payment Transactions Detail Report

Date: 3/17/98

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Account Number	Received Date
9802268195050003	DOW LOHNES & ALBERTSON 1200 NEW HAMPSHIRE AVE NW SUITE 800 WASHINGTON DC 20036	FCC2022136	02/25/98

Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$690.00	\$690.00	1	MPR	1	KKMJFM	ARS ACQUISITION II INC	02116		\$690.00	1	PMT
Total	T								\$690.00		

Chief, Fee Section
Room 452

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

April 9, 1998

OFFICE OF
MANAGING DIRECTOR

Mr. A. L. Pat Roberson
P.O. Box 2292
West Helena, AR 72390

Re: Request for Waiver of Regulatory Fee
Radio Station WSTN-AM
Fee Control # 9710028835509008
Fee Paid: \$1,200

Dear Mr. Roberson:

This is in response to your request for a waiver of Fiscal Year (FY) 1997 regulatory fee for Radio Station WSTN-AM, Somerville, Tennessee, licensed to Fayette County Broadcasting. You argue that the regulatory fee creates a financial hardship for the station. You maintain that your income is insufficient to pay your expenses and that you have had to borrow money to repair the station and keep it operating.

In establishing its regulatory fee program, the Commission recognized that in certain instances payment of a regulatory fee may impose an undue financial hardship upon a licensee. Thus, the Commission decided to grant waivers or reductions of its regulatory fees in those instances where a "petitioner presents a compelling case of financial hardship." Implementation of Section 9 of the Communications Act, 9 FCC Rcd 5333, 5346 (1994), reconsideration granted, 10 FCC Rcd 12759 (1995). The Commission further held that regulatees can establish financial need by submitting:

[I]nformation such as a balance sheet and profit and loss statement (audited, if available), a cash flow projection . . . (with an explanation of how calculated), a list of their officers and their individual compensation, together with a list of their highest paid employees, other than officers, and the amount of their compensation, or similar information.

10 FCC Rcd at 12761-2762.

In determining whether a licensee has sufficient revenues to pay its regulatory fees, the Commission relies upon a licensee's cash flow, as opposed to the entity's profits. Thus, although deductions for amortization and depreciation, which do not affect cash flow, and payments to principals, reduce gross income for tax purposes, those deductions also represent money which is considered to be available to pay the regulatory fee.

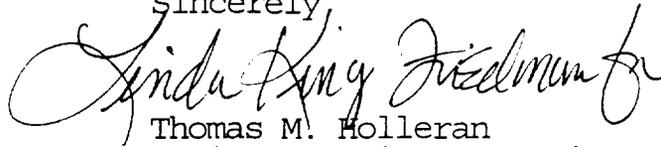
Mr. Roberson

Page 2

In the absence of appropriate documentation, you have failed to establish a compelling case of financial hardship. Therefore, your request for waiver or reduction of the regulatory fee is dismissed. However, in view of your allegations of financial hardship, you may refile WSTN's waiver request together with appropriate supporting documentation within thirty days from the date of this letter.

If you have any questions concerning the regulatory fees, please call the Chief, Fee Section, at (202) 418-1995.

Sincerely,

A handwritten signature in cursive script, appearing to read "Linda King Friedman for".

Thomas M. Holleran
Acting Associate Managing
Director for Operations

10/2/97
471002 8835569028

A.L. PAT ROBERSON
Post Office Box 2292
West Helena, AR 72390

Ref: WSTN- AM
SOMERVILLE, TN

Federal Communications Commission
Washington, D.C. 20544

Dear Sirs,

We respectfully request a waiver for WSTN -AM in Somerville, TN, from the fee stated in the Mass Media Regulatory Fee publication for the following reasons.

WSTN A M is a 500 watt directional station and attempts to provide service to Fayette county Tennessee, approximately 24,000 but hears daily of persons in Somerville and nearby Oakland Tennessee who say they can not hear to their satisfaction, even when we know that we are at proper power and settings. Engineers conclude this problem is due to the directional limitations.

We have operated the station on three different occasions when the new buyers were not able to meet financial requirements of the purchase and income was not sufficient to meet expenses. Last buyer was told by some within the city "you wont last 6 months", he called me within four months actually...income had reached up to 850.00 per month far below his expectations and even though he move 400 miles to try it, and put in dedicated 6 plus days per week, he saw no solution, with listeners saying they cant hear it, even in town, so he backed out.

Have spent 1500.00 on used transmitter this past month... (borrowed money)

Have 1400.00 in engineering bills on the desk

Have 500.00 dollar rent due

Had 9000.00 in expenses (borrowed money)replacing missing parts when we took station back over in Dec of 96 to attempt to again provide service to the town and county.

Have expected income of only 600.00 this month, if they pay.

Yes!!! we have thought many times, is it worth it at all, "Why not close it down" but The city ..the county deserves a local radio station...and we have been trying to keep it going. PLEASE! PLEASE! cancel or greatly reduce the fee proposed.

Fayette County

Small AM stations like ours do not enjoy the interference free reception like that of FM stations contours. even under the best of conditions. It surely seems strange that now, when the airwaves have more signals than ever, the calculation is being considered on the potential listeners (LIKE THERE WERE NO OTHER STATIONS ON THE AIR) when in fact the audience is deluted to its lowest, per station, than at any other time in history.

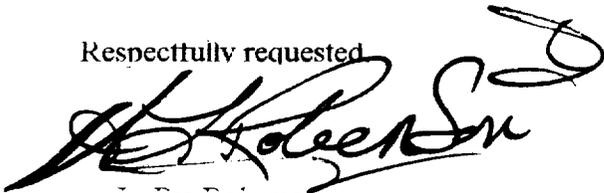
We are but a small speck on the broadcast map, so underpowered to the imposing giants station over the next hills...but our proposed fee is over half what some of them are paying. So uneven is the playing field...Please remove this unfair burdensome fee from us...

Its been up hill for years and now with more regulation expenses it seems the hill just got steeper...

We always work to be good citizens and upright, and will borrow the money and send it, to be timely, but please, GREATLY REDUCE or ELIMINATE this abusive fee.

PLEASE HELP SAVE THE ENDANGERED SPECIES...THE SMALL TOWNS LOCAL RADIO STATION.

Respectfully requested

A handwritten signature in black ink, appearing to read "A. L. Pat Roberson". The signature is stylized and cursive, with a large initial "A" and "R".

A. L. Pat Roberson

Payment Transactions Detail Report

Date: 10/16/97

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Account Number	Received Date
9710028835509008	ROBERSON III, ALFRED L PO BOX 2292	FCC2047550	09/24/97

WEST HELENA AR 72390

Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$1,200.00	\$1,200.00	1	MGE7	1	WSTN	FAYETTE COUNTY BROADCASTING	38068		\$1,200.00	1	PMT
Total									\$1,200.00		

9710028835509008

RECEIVED
Oct 7 8 05 AM '97
FEDERAL COMMUNICATIONS COMMISSION

RECEIVED
OCT-2 1997

FCC MAIL ROOM

SEPTEMBER 17TH, 1997

WSTN AM RADIO STATION
P O BOX 2292
WEST HELENA, ARKANSAS 72390

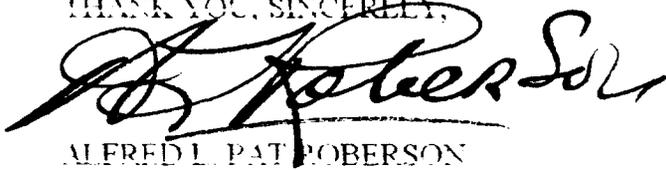
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET
WASHINGTON D. C. 20544

DEAR SIRs,

ENCLOSED WE PRESENT ORGINAL AND THREE COPIES OF PETITION FOR
RECONSIDERATION FOR THE COMMISSION.

YOUR TIME AND CONSIDERATION ARE APPRECIATED.

THANK YOU, SINCERELY,



ALFRED L. PAT ROBERSON

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

in the Matter of)
)
FY 1997 Mass Media Regulatory Fees)
)
Assessment and Payment for 1997 FCC)
Regulatory Fees)

RECEIVED
OCT - 2 1997
FCC MAIL ROOM

TO: The Full Commission

PETITION FOR RECONSIDERATION

A. L. Pat Roberson, licensee WSTN-AM Somerville, TN, hereby respectfully request the FCC to reconsider and set aside the schedule of Mass Media Regulatory Fees, released August 1, 1997 and to grant other relief as described below. In support thereof, it is alleged.

1. On August 1, 1997 the Commission released a Public Notice entitled FY 1997 Mass Media Regulatory fees. In the Public Notice, the FCC purports to assess fees based upon the class of station and the coverage of the station. Several small AM broadcasters, including myself, have been shocked to find the fees have been increased as much as 400% over the fees payable in fiscal year 1996.

2. The undersigned has looked into the matter and it appears that the FCC has miscalculated the populations served by AM broadcast

stations, and in particular, AM broadcast stations situated near urbanized areas. Section 73.182(d) of the Commission's Rules and Regulations provides that "the ground wave signal strength required to render principal service is 2mv/m for communities with population of 2500 or more and 0.5 mv/m for communities with populations of less than 2500." Pursuant to that requirement, populations situated in urbanized areas and/or communities of 2500 population or more must be excluded in calculating the population which is inside an AM station's 0.5 mv/m contour. It appears, however that in calculating coverage for the purpose of assessing a regulatory fee the Commission has overlooked its own rule, and has failed to make the required exclusion.

3. Example of our 500 watt, directional day and night, covers in fact about 25,000 people, on a good day. Some right here in town and in a town nearby, Oakland, some 8 miles away, have frequently told us that they can hardly hear us, even when we know we are properly tuned and at proper levels. Perhaps the records at the commission somehow show we are a 5000 watt station and not handicapped with directional requirements, when we in fact are 500 directional watts.

Small AM station's 2 mv/m contour does not enjoy interference free reception like that of 1 mv/m FM stations contour even under the best of conditions. It surely seems strange that now, when the airwaves have more signals than ever, the calculation is being considered on the potential

listeners (like there were no other stations on the air) when, in fact the audience is deluted to its lowest, per station, than at anytime in history.

4. The undersigned does not think the FCC intended to increase the regulatory fees for small AM stations by 400% or more, nor put stations off the air permanently, with excessive fees. These fees in fact favor the larger operators and groups over the single station operator, especially the small stations operators who have fewer staff, if any staff, due in part to new wage increases mandated by the government, to do the daily task, and then smaller station operators must contract engineering, legal and find time to do the other required task, of running a station, in compliance, when larger stations and groups have full time staff members to do these required duties. We are trying to provide a service to the local community, daily. However, by failing to follows its own rules in calculating coverage. the FCC has placed an enormous burden on these small licensees. The undersigned respectfully request the FCC to recalculate the coverage of all AM broadcast stations in a manner consistent with the requirements of Section 73.182(d) of the Commissions Rules and Regulations. It perhaps might best be simple to calculated the coverage based on the 2 mv/m contour, instead of the 0.5 mv/m contour. Another choice might be to, with the necessary resources the Commission may calculate the coverage within the 0.5 mv/m contour but exclude urbanized areas falling outside the 2 m v/m contour.

5. Whatever the case, the Commission is bound by its own rules. SERVICE v. DULLES, 354 U.S. 363, 77 S.Ct. 1152, 1LEd.2d 1403 (1957). The calculations used by the FCC in setting the FY 1997 Regulatory Fees violates

the Commission's own rules. Therefore, corrective action should promptly be taken.

Respectfully submitted

September 17th, 1997

A. L. Pat Roberson

A.L. Pat Roberson
P O Box 2292
West Helena, AR 72390

A handwritten signature in black ink, appearing to read "A. L. Pat Roberson", written in a cursive style with a long horizontal flourish at the end.

Engineering Section
Room 452

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

April 17, 1998

OFFICE OF
MANAGING DIRECTOR

Mr. Frank Fee
General Manager
KROX Radio AM
P.O. Box 620
Crookston, MN 56716-0620

Re: Request for Reduction of Regulatory Fee
Fee Control # 9709158835165005
Fee Paid: \$1,000

Dear Mr. Fee:

This is in response to your request for reduction and partial refund of the Fiscal Year (FY) 1997 Regulatory Fee for Class B AM Radio KROX, Crookston, Minnesota. You argue that KROX is a small "stand alone" radio station serving a community of 8,000 people and the 4 counties surrounding Crookston. You assert that KROX operates with reduced power after sunset; that it does not serve the population attributed to it; that its \$1,000 fee is comparable to the fee assessed larger stations; and that comparable stations in the area are paying much lower fees.

Fees are not based on actual listenership, but rather on the population residing within a licensee's protected service contours. In formulating the FY 1997 broadcast fee schedule, station limitations, such as daytime only operation, were recognized by assigning weighted populations to each station. Higher quality stations were assigned greater weight than stations which operate either daytime only or nighttime with reduced power. 47 C.F.R. § 73.21; Assessment and Collection of Regulatory Fee for Fiscal 1997, FCC 97-215, ¶¶ 47- 56, released June 26, 1977.

Congress established the total amount of fees that we are to collect for all services for FY 1997 and our fee schedule is formulated to spread the burden of the total fee requirement equitably among the various categories of fee payers, including broadcast licensees. The FY 1997 regulatory fees for all AM stations were derived by calculating the populations within the 0.5 mV/m contour of each individual station, which is their daytime protection contour. The 0.5 mV/m contour, generally includes areas not considered to be within the "core" area served by a station. However, as a matter of equity, recalculation of a station's service area using a different contour for measuring population would require the recalculation of service areas, populations, and fees, at a minimum, for all radio broadcast stations, in order to insure the Commission's ability to collect the required amount in fees.

We recognize that some broadcasters believe that the city grade contour which each licensee is required to place over its community of license may be a better reflection of the "core" population served by that station, and we contemplate using the city grade contour to calculate FY 1998 radio regulatory fees. However, the 0.5 mV/m contour is appropriate in formulating the methodology for calculating the FY 1997 regulatory fees because that contour does represent the area in which listeners receive the station's interference free signal. Thus, the Commission will not reduce, on an ad hoc basis, an individual station's regulatory fee solely because its population served would be lower had we relied on a different service contour.

Accordingly, your request for reduction of the regulatory fee is denied. If you have any questions concerning the fees, please call the Chief, Fee Section, at (202) 418-1995.

Sincerely,

W. Lewis Fox

Thomas M. Holleran
Acting Associate Managing
Director for Operations

Jerry

9709158835165005

FCC

September 12, 1997

Dear Sirs:

I'm writing to request a reduction in the regulatory fee that has been assessed for KROX-AM Radio in Crookston, Mn.

We are listed as covering a population base of over 239,000. This is not an accurate figure. We are based in a town with the population of 8,000 people. We STRONGLY cover about 4 counties that surround Crookston. WE DO NOT COVER INTO GRAND FORKS, North Dakota, which is where the figures that Data World has come up with. We are a small stand-alone AM station that is being assessed \$1,000.00 and comparable AM's in our area are paying \$400.00 and even an FM is paying 200.00. This is not fair to KROX-AM. No matter what Data World figures, we do not cover that area and especially when WE HAVE TO CUT OUR POWER DOWN TO 500 WATTS at sunset. If the commission were to grant us permission to NOT CUT OUR POWER than maybe we could look at the 1,000 figure and see if that still was fair. In your system, a big 100,000 Watt giant pays no more than a 1000 Watt stand alone in a market of 8,000. This does not add up. YOU HAVE TO GIVE RELIEF TO THE SMALLER STATIONS THAT DON'T BILL A FRACTION OF WHAT THE OTHERS ARE BILLING.

Thanks for you time and consideration of reducing the fee for KROX-AM.

Sincerely,
Frank Fee

Frank Fee
General Manager-President
KROX RADIO-AM

P.O. Box 620
Crookston, Mn., 56716-0620
(218) 281-1140

Grapher Communications Co

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

Chief, Fee Section
Room 452

April 17, 1998

OFFICE OF
MANAGING DIRECTOR

Mr. Gilbert Hammond
President
Hammond Broadcasting, Inc.
2001 Main Street
Paris, KY 40361

Re: Request for Waiver of Regulatory Fees
Fee control # 9709238835854001

Dear Mr. Hammond:

This is in response to your request, filed on behalf of Hammond Broadcasting, Inc., licensee of AM Radio Station WYGH, Paris, Kentucky, for a waiver of the Fiscal Year (FY) 1997 regulatory fee. You argue that the Commission should waive the fee because WYGH is located in an area that was affected by severe flooding in March 1997, that the area was declared a Federal Disaster area; as a result of the flood, WYGH lost approximately 30% of its advertising revenues.

In establishing its regulatory fee program, the Commission recognized that in certain instances payment of a regulatory fee may impose an undue financial hardship upon a licensee. Thus, the Commission decided to grant waivers or reductions of its regulatory fees in those instances where a "petitioner presents a compelling case of financial hardship." Implementation of Section 9 of the Communications Act, 9 FCC Rcd 5333, 5346 (1994), reconsideration granted, 10 FCC Rcd 12759 (1995). The Commission further held that regulatees can establish financial need by submitting:

[I]nformation such as a balance sheet and profit and loss statement (audited, if available), a cash flow projection . . . (with an explanation of how calculated), a list of their officers and their individual compensation, together with a list of their highest paid employees, other than officers, and the amount of their compensation, or similar information.

10 FCC Rcd at 12761-2762.

In determining whether a licensee has sufficient revenues to pay its regulatory fees, the Commission relies upon a licensee's cash flow, as opposed to the entity's profits. Thus, although deductions for amortization and depreciation, which do not affect cash flow, and payments to principals, reduce gross income for tax purposes, those deductions also represent money which is considered to be available to pay the regulatory fee.

You have not documented how the regulatory fee would create a financial hardship for WYGH and your request for waiver of the fee is dismissed. However, in view of your allegations of the loss of revenues at the station, you may file a new request for waiver of the FY 1997 regulatory fee, together with appropriate supporting documentation, within thirty days from the date of this letter.

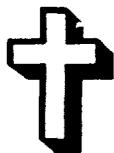
If you have any questions concerning the regulatory fee, please call the Chief, Fee Section, at (202) 418-1995.

Sincerely,

W. Lewis for

Thomas M. Holleran
Acting Associate Managing
Director for Operations

4709238835854001



HAMMOND BROADCASTING, INC.

All to the Glory of God! I Cor. 10:31

9/13

SEP 18 1997

FCC MAIL ROOM

2/10/97

September 15, 1997

Secretary,
Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

Dear Secretary:

I am requesting a wavier of the regulatory fees of \$1000 plus the auxiliary fees of \$100 for radio station WYGH-AM in Paris, Kentucky. This entire area was affected by severe flooding in March of 1997 and was designated by President Clinton as a Federal Disaster area.

The result of the flooding was a severe loss of property in Paris and Bourbon County as well as much of the surrounding area. Radio station WYGH-AM suffered from the flooding and also lost approximately 25% of its advertising base when businesses were closed due to the flooding. Although a portion of these ultimately reopened for business, many closed their doors permanently. The effect has been more than a 30% loss in advertising revenue thus far for 1997.

For the reasons outlined above, I respectfully request a waive of the regulatory fees in the total amount of \$1100 for 1997.

Sincerely,

Gilbert Hammond, President
Hammond Broadcasting, Inc. WYGH-AM

"Serving Northern, Central, & Southern Kentucky; Southwest Ohio; Southeast Indiana"

WIOK
P.O. Box 50
Falmouth, KY 41040
606-472-6351 606-472-1075 FAX 606-472-2875

WIDS
P.O. Box 597
Russell Springs, KY 42642
502-866-8800

WYGH
2001 Main Street
Paris, KY 40361
606-987-1440

Payment Transactions Detail Report

Date: 11/7/97

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Account Number	Received Date
9709238835854001	HAMMOND BROADCASTING INC 13297 GREEN ROAD	FCC2010906	09/17/97
	WALTON KY 41094		

Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$2,550.00	\$2,550.00	3	MGG7	1	WIDS	HAMMOND BROADCASTING INC	41094		\$800.00	2	PMT
\$2,550.00	\$2,550.00	6	MUB7	2	WIDSAM	HAMMOND BROADCASTING INC	41094		\$50.00	2	PMT
\$2,550.00	\$2,550.00	1	MGH7	1	WIOKFM	HAMMOND BROADCASTING INC	41094		\$600.00	2	PMT
\$2,550.00	\$2,550.00	5	MUB7	2	WIOKFM	HAMMOND BROADCASTING INC	41094		\$50.00	2	PMT
\$2,550.00	\$2,550.00	2	MGF7	1	WYGHAM	HAMMOND BROADCASTING INC	41094		\$1,000.00	2	PMT
\$2,550.00	\$2,550.00	4	MUB7	2	WYGHAM	HAMMOND BROADCASTING INC	41094		\$50.00	2	PMT
Total	6								\$2,550.00		

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

Chief, Broadcast
Regulatory

April 17, 1998

OFFICE OF
MANAGING DIRECTOR

Mr. Don Stubblefield
King of Kings Broadcasting
831 West Daugherty
Webb City, MO 64870

Re: Request for Reduction of Regulatory Fee
Fee Control # 9709238835396005

Dear Mr. Stubblefield:

This is in response to your request for reduction of the regulatory fee for AM Radio Station KKLL, Webb City, Missouri. You argue that KKLL is a day-time only station, a major part of the population attributed to it is located at the edge of its 0.5 mV/m signal contour, and that you lack the funds to pay the \$1,200 fee assessed KKLL.

Congress established the total amount of fees that we are to collect for all services for FY 1997 and our fee schedule is formulated to spread the burden of the total fee requirement equitably among the various categories of fee payers, including broadcast licensees. The FY 1997 regulatory fees for all AM stations were derived by calculating the populations within the 0.5 mV/m contour of each individual station, which is their daytime protected service contour. Consequently, as a matter of equity, recalculating a station's service area using a different contour for measuring population would require recalculating the service areas, populations, and fees, at a minimum, for all radio broadcast stations, in order to insure the Commission's ability to collect the required amount in fees and that licensees are treated equally.

We recognize that some broadcasters believe that the city grade contour which each licensee is required to place over its community of license may be a better reflection of the "core" population served by that station, and we contemplate using the city grade contour to calculate FY 1998 radio regulatory fees. However, the 0.5 mV/m contour is appropriate for calculating the FY 1997 regulatory fees because that contour represents the area in which listeners receive the station's protected signal.

In establishing the regulatory fee program, the Commission recognized that in certain instances licensees would be unable to pay their regulatory fees without impairing the quality of their service to the public. Thus, the Commission decided to grant waivers or reductions of its regulatory fees in those instances

where a "petitioner presents a compelling case of financial hardship." See Implementation of Section 9 of the Communications Act, 9 FCC Rcd 5333, 5346 (1994), reconsideration granted, 10 FCC Rcd 12759 (1995).

The Commission further held that regulatees can establish financial need by submitting:

[I]nformation such as a balance sheet and profit and loss statement (audited, if available), a cash flow projection . . . (with an explanation of how calculated), a list of their officers and their individual compensation, together with a list of their highest paid employees, other than officers, and the amount of their compensation, or similar information.

10 FCC Rcd at 12761-762, ¶¶ 12-13.

In determining whether a licensee has sufficient revenues to pay its regulatory fees, the Commission relies upon an applicant's cash flow, as opposed to the entity's profits. Thus, deductions for amortization and depreciation and payments to principals, which reduce gross income for tax purposes, represent money which is ordinarily available to pay the regulatory fees.

In the absence of the required documentation, KLL has failed to establish a compelling case of financial hardship. Therefore, your request for a waiver of the regulatory fee is dismissed. However, in view of your allegation that Radio Station KLL lacks adequate funds to pay the fee, you may file a further request for waiver of the fee, supported by appropriate documentation, within 30 days from the date of this letter.

If you have any questions concerning the regulatory fee, please call the Chief, Fee Section, at (202) 418-1995.

Sincerely,

W. Lewis Fox

Thomas M. Holleran
Acting Associate Managing
Director for Operations

470923 8835396005

AM 1100



"King Of Kings
Lord Of Lords"

831 W. Daugherty
Webb City, MO 64870

DON STUBBLEFIELD
Owner and General Manager

JIM TAYLOR
News Director and Sports Director

ART ROGERS
Station Manager and Program Director

JIM YOUNG
General Commercial Sales Manager

Managing Director,

I would like to make an appeal to lower or waiver my regulatory fee for the following reasons:

- 1- KKLL is a 5000 watt day-time only station (actual watts 4242)
- 2- KKLL is a critical hour station, the first two hours and the last two hours we are at 2500 watts.
- 3- At the very edge of our .5mV/m is where the major part of the population is located.
- 4- Webb City is a town of 7000 people and we do not have the money to pay such high taxes that the Regulatory fee charges.

If you could lower the tax or regulatory fee it certainly would be appreciated.

Thank You,

Don Stubblefield

9769238835396005

AM 1100



831 W. Daugherty
Webb City, MO 64870

"King Of Kings
Lord Of Lords"

DON STUBBLEFIELD
Owner and General Manager

JIM TAYLOR
News Director and Sports Director

ART ROGERS
Station Manager and Program Director

JIM YOUNG
General Commercial Sales Manager

FCC's Lockbox Bank

I would like to make an appeal to lower or waiver my regulatory fee for the following reasons:

- 1- KKLL is a 5000 watt day-time only station (actual watts 4242)
- 2- KKLL is a critical hour station, the first two hours and the last two hours we are at 2500 watts.
- 3- At the very edge of our .5mV/m is where the major part of the population is located.
- 4- Webb City is a town of 7000 people and we do not have the money to pay such high taxes that the Regulatory fee charges.

If you could lower the tax or regulatory fee it certainly would be appreciated.

Thank You,

Don Stubblefield

Payment Transactions Detail Report

Date: ...16/97

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Account Number	Received Date
9709238835396005	STUBBLEFIELD, DON	FCC2046744	09/22/97
	2305 GLENDALE ROAD		
	JOPLIN MO 64804		

Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$1,875.00	\$1,875.00	1	MGE7	1	KKLL	STUBBLEFIELD, DON	64804		\$1,200.00	1	PMT
\$1,875.00	\$1,875.00	4	MUB7	1	KPF224	STUBBLEFIELD, DON	64804		\$25.00	1	PMT
\$1,875.00	\$1,875.00	5	MUB7	1	KPG922	STUBBLEFIELD, DON	64804		\$25.00	1	PMT
\$1,875.00	\$1,875.00	2	MGH7	1	KWAS	STUBBLEFIELD, DON	64804		\$600.00	1	PMT
\$1,875.00	\$1,875.00	3	MUB7	1	WHY808	STUBBLEFIELD, DON	64804		\$25.00	1	PMT
Total	5								\$1,875.00		

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

April 30, 1998

OFFICE OF
MANAGING DIRECTOR

Mr. Gary Vaile
President
KITA, Inc.
723 West 14th Street
Little Rock, AR 72202

Re: Request for Reduction of Regulatory Fee
Fee Control # 9709198835437001

Dear Mr. Vaile:

This is in response to your request for reduction of the Fiscal Year (FY) 1997 regulatory fee paid by KITA, Inc., licensee of AM Radio Station KITA. You argue that the Commission erred in calculating KITA's fee based on the population in its 0.5 mV/m contour because KITA is required to provide 2 mV/m signal to its primary service area.

Congress established the total amount of fees that we are to collect for all services for FY 1997 and our fee schedule is formulated to spread the burden of the total fee requirement equitably among the various categories of fee payers, including broadcast licensees. The FY 1997 regulatory fees for all AM stations were derived by calculating the populations within the 0.5 mV/m contour of each individual station, which is their daytime protected service contour. Consequently, as a matter of equity, recalculating a station's service area using a different contour for measuring population would require recalculating the service areas, populations, and fees, at a minimum, for all radio broadcast stations, in order to insure the Commission's ability to collect the required amount in fees and treat all licensees equally.

We recognize that some broadcasters believe that the city grade contour which each licensee is required to place over its community of license may be a better reflection of the "core" population served by that station, and we contemplate using the city grade contour to calculate FY 1998 radio regulatory fees. However, the 0.5 mV/m contour is appropriate in formulating the methodology for calculating the FY 1997 regulatory fees because that contour represents the area in which listeners are within the station's protected signal contours. Thus, the Commission will not reduce, on an ad hoc basis, an individual station's regulatory fee solely because its population served would be lower had we relied on a different service contour.

Mr. Vaile

Page 2

Accordingly, your request for reduction of the regulatory fee is denied. If you have any questions concerning the regulatory fee, please call the Chief, Fee Section, at (202) 418-1995.

Sincerely,



Thomas M. Holleran
Acting Associate Managing
Director - Financial Operations

kita
GREAT GOSPEL SOUNDS

5,000 WATTS
1440 AM

LOCALLY OWNED AND OPERATED

50,000 WATTS
107.7 FM

ky n
MUSIC FROM HEAVEN

SEPTEMBER 15, 1997

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.

RE: FCC REGULATORY FEES

DEAR SIR OR MADAME:

Enclosed is a check for \$1,475.00 for radio station KITA, licensed to KITA, INC. in Little Rock, Arkansas. This amount is for \$1,400.00 for KITA-AM at 1440 khz and \$75.00 for three auxiliary services.

Also, it has come to my attention that KITA may have been overcharged as to the amount due. By Public Notice (Correction to Regulatory Fee Order) issued September 2, 1997, the Commission advised that the 0.5mV/M contour was used in determining the population served by AM stations. The commission is requested, pursuant to Section 1.1166 (a) of the Rules, to recalculate the population between the station's 2 mV/m contour and its 0.5mV/m contour to exclude communities with populations of 2,500 or more and to reduce the regulatory fee accordingly. ("The groundwave signal strength required to render primary service is 2 mV/m for communities with populations of 2,500 or more and 0.5 mV/m for communities with populations of less than 2,500.") 47 C.F.R. § 73.182 (d).

Thank you for your attention to this matter. I will await a response to this question I have raised. You may contact me at the address listed below.

Respectfully Submitted,



Gary Vaile
President/General Manager

Enclosure: FCC Form 159 and a check for \$1,475.00

Payment Transactions Detail Report

Date: 10/16/97

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Account Number	Received Date
9709198835437001	KITA INC	FCC2029176	09/16/97
723 WEST 14TH STREET			
LITTLE ROCK AR 72202			

Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$1,475.00	\$1,475.00	3	MUB7	1	KB97368	KITA INC	72202		\$25.00	1	PMT
\$1,475.00	\$1,475.00	4	MUB7	1	KB97369	KITA INC	72202		\$25.00	1	PMT
\$1,475.00	\$1,475.00	1	MGD7	1	KITA	KITA INC	72202		\$1,400.00	1	PMT
\$1,475.00	\$1,475.00	2	MUB7	1	WLJ517	KITA INC	72202		\$25.00	1	PMT
Total									\$1,475.00		

*Chief, the section
Kramer 1.2*

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

April 10, 1998

OFFICE OF
MANAGING DIRECTOR

Mr. Edward Kramer
President
Kramer Broadcasting, Inc.
Highway 51 South
P.O. Box 300
Portage, Wisconsin 53901

Re: Request for Reduction of Regulatory Fee
Fee Control # 9709158835174002

Dear Mr. Kramer:

This is in response to your letter requesting a reduction of the Fiscal Year (FY) 1997 regulatory fee for AM Radio Station WPDR, Portage, Wisconsin. You argue that WPDR does not serve the population attributed to it for assessing the regulatory fee. You assert that WPDR should be assessed the regulatory fee for a station serving a smaller population base.

Congress established the total amount of fees that we are to collect for all services for FY 1997 and our fee schedule is formulated to spread the burden of the total fee requirement equitably among the various categories of fee payers, including broadcast licensees. The FY 1997 regulatory fees for all radio stations were derived by calculating the populations within the interference free contour of each individual station, which is their daytime protected service contour and extends to areas outside of a licensee's primary service area. Consequently, as a matter of equity, recalculating a station's fee using a different formula or a different service contour for measuring population, would require recalculating the service areas, populations, and fees, at a minimum, for all radio broadcast stations, in order to insure the Commission's ability to collect the required amount in fees and that all licensees are treated equally.

The regulatory fee schedule as adopted by Congress, initially assessed radio fees based solely on the class of station, irrespective of the areas or populations covered. The Commission developed the present formula using both class of station and service area served, in an attempt to make the schedule more fair and equitable. We are aware of complaints by licensees concerning the equity of the present fee schedule, and we plan to consider revising the formula in connection with developing the FY 1998 fee schedule. However, the interference free contour is appropriate in formulating the methodology for calculating the FY 1997 regulatory fees because that contour represents the area in which listeners receive the station's protected signal. Thus,

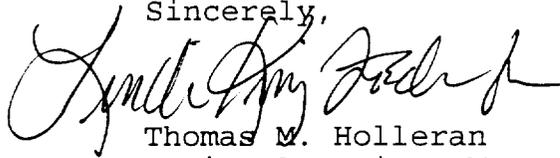
Mr. Edward Kramer

2.

the Commission will not reduce, on an ad hoc basis, an individual station's regulatory fee solely because the licensee believes it serves a smaller population.

Accordingly, your request for reduction of the regulatory fee is denied. If you have any questions concerning the regulatory fee, please call the Chief, Fee Section, at (202) 418-1995.

Sincerely,

A handwritten signature in cursive script, appearing to read "Tom Holleran".

Thomas M. Holleran
Acting Associate Managing
Director for Operations



970915883511700

Kramer Broadcasting, Inc.
WPDR - WDDC

Highway 51 South
Post Office Box 300
Portage, Wisconsin 53901
(608) 742-8833 (800) 362-9631

September 5, 1997

Secretary
Federal Communications Commission
1919 M Street NW
Washington DC 20554

In submitting the enclosed check, I wish to petition for a reduction in my WPDR-AM fee.

The chart of fees to pay indicates that our 0.5 mV/m serves a population of over 600,000, presumably including the city of Madison which is almost 40 miles away. While a technical measurement may indicate that we barely reach the city of Madison, the reality is that WPDR can not be heard with a listenable signal in Madison or any other population center of any consequence.

Our city of license and our studios/office are in a small town of less than 9,000. Our county has 45,000. The adjacent county west has about the same. The adjacent county east has about 75,000 but the nearest point is about 25 miles away. To the north is a county with 12,000 in it. We do have a somewhat listenable signal in parts of the northern rural area of Dane County, but north of Madison.

The reality is that its reasonably possible to hear WPDR in an area with a population in the range of 70,000 or 80,000 and some of that area is quite questionable. Our advertisers would love it if WPDR could be heard by listeners in an area populated by over 600,000 people.

It would be appreciated if you could re-consider the size of the population served by WPDR.

Sincerely,

Kramer Broadcasting, Inc.
Edward Kramer, Pres/GenMgr

Payment Transactions Detail Report

Date: 10/16/97

Fee Control
Number

Jenny

Payor
Name

BY: FEE CONTROL NUMBER

Account
Number

Received
Date

9709158835174002

KRAMER BROADCASTING INC

D391206018

09/15/97

PO BOX 300

N6912 HWY 51

PORTAGE WI 53901

Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$1,650.00	\$1,650.00	4	MUB7	1	KK7843	KRAMER BROADCASTING INC			\$25.00	1	PMT
\$1,650.00	\$1,650.00	3	MUB7	1	KZ2488	KRAMER BROADCASTING INC			\$25.00	1	PMT
\$1,650.00	\$1,650.00	2	MGH7	1	WDDC	KRAMER BROADCASTING INC			\$600.00	1	PMT
\$1,650.00	\$1,650.00	1	MGF7	1	WPDR	KRAMER BROADCASTING INC			\$1,000.00	1	PMT
Total		4							\$1,650.00		