

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

CREDIT & DEBIT MANAGEMENT
CORP ONE

DEC 18 2000

OFFICE OF
MANAGING DIRECTOR

Robert M. Bradford
16251 Ninth Avenue, SW
Burien, WA 98166-2923

Request for Waiver of Regulatory Fees
Fee Control No. 9704018165489004

Dear Mr. Bradford:

This is in response to your February 12, 2000 request for waiver of the Fiscal Years 1993 (FY 1993) and 1997 (FY 1997) regulatory fees for television translators K07OT, K09NU, K11KV, and K13DQ, licensed to Glenwood T. V. Association in Glenwood, Washington. You assert that Glenwood T. V. Association is a volunteer, non-profit entity and that the fees paid by that entity in 1993 and 1997 should be refunded. Notwithstanding your assertions about the nature of Glenwood T. V. Association, your request was not filed until long after the close of the Fiscal Years in question and accordingly your request concerning FY 1993 and FY 1997 fees does not provide a basis for relief or otherwise warrant any further consideration.

To the extent that your request, in asserting that Glenwood T. V. Association should never have had to pay a fee and should have had a non-profit status, could be construed as requesting relief with respect to Fiscal Year 2000 (FY 2000) regulatory fees, we note the following. In implementing the regulatory fee program, the Commission stated that it would waive its regulatory fees for any community-based translator station that:

- (1) is not licensed to, in whole or in part, and does not have common ownership with, the licensee of a commercial broadcast station;
- (2) does not derive income from advertising;
- and (3) is dependent on subscriptions or contributions from members of the community served for support.

Implementation of Section 9 of the Communications Act, FCC 95-257, ¶ 16, released June 22, 1995.

The burden is on the licensee to document fully the eligibility for waiver, otherwise the regulatory fee is due. *Id.* Your request does not document eligibility for waiver of regulatory fees in accordance with the requirements set forth above. Therefore, there is also no basis to grant relief with respect to FY 2000 regulatory fees. Nevertheless, in

Mr. Robert M. Bradford

2.

light of your general allegations, if you wish, you may file a further request for relief with respect to FY 2000 fees together with an appropriate supporting showing within 30 days from the date of this letter.

If you have any questions concerning the regulatory fees, please call the Revenue & Receivable Operation Group at (202) 418-1995.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Reger", with a stylized flourish at the end.

 Mark A. Reger
Chief Financial Officer

Translator station: Glenwood TV Association

There is only one request relating to translator stations. The general policy is explained in Jerry Remson's standard language. Donna often handles the translator requests and may be willing to take this one on. It looks standard on its face.

no regulatory fee in 1993

Donna, but
not Andrea

how many in CMD +
- how many here

012-12-2000
Seems to ask for waiver / refund
of fee paid ~~Sept 1997~~.

~~Also asks for refund of fee~~
~~paid~~ in '93 + '97

Does not provide magic words
but implication is that magic
words fit this situation

Translator Sales and Service

Robert M. Bradford
16251 Ninth Avenue SW
Burien, WA. 98166-2923
206-242-9036

12 February, 2000

Office of Managing Director
Federal Communications Commission
445 12th Street SW, Room 1-A625
Washington, DC 20554

Subject: Waiver of Television Translator Regulatory Fee.

Applicant: Glenwood T. V. Association.
Eugene Burrell, Pres.
Helen Eaton, Sec., Treas.
Glenwood, WA 98619
Television Translators; K07OT, K09NU, K11KV, K13DQ.
Power, 1 Watt.

From 1960, until my retirement several years ago, I was involved with the sales, service and installation of VHF and UHF low power television translators in the Pacific northwest. I also prepared license applications and filed renewals. Glenwood TV Association used my services since the mid 1960's and recently asked me to look into the fees they are now asked to pay. The regulatory fee of \$290.00 per station is far more than they will collect in donations for the year. At one time, late 1960s, the FCC decided to charge a fee for construction permits, \$30.00 I believe of which \$10.00 was refunded, and this met with so much opposition from translator groups that the fee was discontinued. In 1993 Glenwood paid \$40.00 per channel and in 1997 \$45.00 per channel in regulatory fees. Given that their operating funds are wholly derived from donations an increase to \$290.00 per channel is beyond reason as well as their means.

This group was founded about 1960 as a volunteer, non profit entity to obtain TV reception in a community that is surrounded by mountains and is many miles from commercial TV stations. Direct reception is impossible. Cable TV is impractical. Collecting money to operate a translator system

has always been a problem as there is no way to force people to pay. Their attitude is that commercial TV is "free" so why should a charge be made for translator TV. They are the first to complain when problems develop and the last to volunteer for a work party to clean up after storm damage. Since its inception this association has been supported by a small group of volunteers who have never been paid one cent for their services. They have donated time, transportation and paid for their own gasoline. The expenses for new equipment, power, insurance, maintenance and other costs must come from donated funds that are collected by these same volunteers. At this time they are in need of a new pole to mount the transmitting antenna, the old one being used for almost forty years. As with most logging community's in the Pacific Northwest, the pole is easy to come by. However installing it is another matter and will result of the expense of hiring someone with the equipment to set poles.

I do not believe this group should ever have had to pay a fee and should have had a non profit status. At this time, in a community of 600 persons, about twenty are paying the yearly donation of \$50.00 and I am told by Mr. Burril that some of these can not afford the entire amount. When this group was organized in 1960, less than half the family's financially supported it and the donation at that time was less than half of what is asked today.

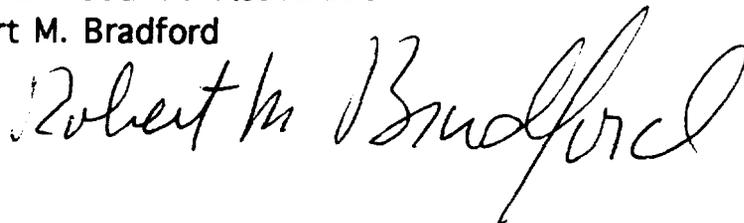
I further believe that the fees they paid in 1993 and 1997 should be refunded.

We would appreciate your thoughts in this matter. You may reply to myself as technical director, Eugene Burril, President, or to Helen Eaton, Secretary Treasurer

Yours truly.

For Glenwood TV Association.

Robert M. Bradford

A handwritten signature in cursive script that reads "Robert M. Bradford". The signature is written in black ink and is positioned below the typed name.

Payment Transactions Detail Report

Date: 03/07/2000

BY: FEE CONTROL NUMBER

| Fee Control Number | Payor Name | | Fcc Account Number | Payer TIN | Received Date | | | | | | |
|--------------------|--------------------------------------|---------|--------------------|-----------|-------------------|----------------|---------------|-----------|----------------|------------|--------------|
| 9704018165489004 | GLENWOOD TV ASSOCIATION PO BOX 13 | | FCC2035824 | | 3/31/1997 00:00:0 | | | | | | |
| | GLENWOOD | WA | 98619 | | | | | | | | |
| 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 |
| \$45.00 | \$45.00 | 1 | MAL | 1 | K13DQ | EATON, HELEN | 98619 | | \$45.00 | 1 | PMT |
| Total | | | | | | | | | <u>\$45.00</u> | | |

Payment Transactions Detail Report

Date: 03/07/2000

BY: FEE CONTROL NUMBER

| Fee Control Number | Payor Name | | | | Fcc Account Number | Payer TIN | Received Date | | | | | |
|--------------------|--------------------------------------|----------|-------------------|----------|--------------------|----------------|-------------------|-----------|---------------|----------------|--------------|--|
| 9704018165489005 | GLENWOOD TV ASSOCIATION PO BOX 13 | | | | FCC2035824 | | 3/31/1997 00:00:0 | | | | | |
| | GLENWOOD | WA | 98619 | | | | | | | | | |
| 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 | |
| \$45.00 | \$45.00 | 1 | MAL | 1 | K11KV | EATON, HELEN | 98619 | | \$45.00 | 1 | PMT | |
| Total | | 1 | | | | | | | | \$45.00 | | |

Payment Transactions Detail Report

Date: 03/07/2000

BY: FEE CONTROL NUMBER

| Fee Control Number | Payor Name | Fcc Account Number | Payer TIN | Received Date | | | | | | | |
|--------------------|--------------------------------------|--------------------|-------------------|-------------------|-------------------|----------------|---------------|-----------|----------------|------------|--------------|
| 9704018165489006 | GLENWOOD TV ASSOCIATION PO BOX 13 | FCC2035824 | | 3/31/1997 00:00:0 | | | | | | | |
| | GLENWOOD WA 98619 | | | | | | | | | | |
| 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 |
| \$45.00 | \$45.00 | 1 | MAL | 1 | K09NU | EATON, HELEN | 98619 | | \$45.00 | 1 | PMT |
| Total | | | | | | | | | <u>\$45.00</u> | | |

Payment Transactions Detail Report

Date: 03/07/2000

BY: FEE CONTROL NUMBER

| Fee Control Number | Payor Name | | | Fcc Account Number | Payer TIN | Received Date | | | | | |
|--------------------|--------------------------------------|---------|-------------------|--------------------|-------------------|-------------------|---------------|-----------|---------------|------------|--------------|
| 9704018165489007 | GLENWOOD TV ASSOCIATION PO BOX 13 | | | FCC2035824 | | 3/31/1997 00:00:0 | | | | | |
| | GLENWOOD | WA | 98619 | | | | | | | | |
| 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 |
| \$45.00 | \$45.00 | 1 | MAL | 1 | K07OT | EATON, HELEN | 98619 | | \$45.00 | 1 | PMT |
| Total | | | | | | | | | \$45.00 | | |

Supplemental

Translator Sales and Service

Robert M. Bradford
16251 Ninth Avenue SW
Burien, WA. 98166-2923
206-242-9036

RECEIVED
FCS

2000 MAR 04 P 2:33

12 February, 2000

Office of Managing Director
Federal Communications Commission
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Power, 1 Watt.

Pursuant to our telephone conversation, I am sending copies of checks written to the FCC for translator fees for 1993 in the amount of \$140.00, and for 1997 in the amount of \$180.00. I also enclose a copy of my original letter.

The Glenwood T. V. Association and myself appreciate your consideration of this matter.

You may reply to myself as technical director, Eugene Burril, President, or to Helen Eaton, Secretary Treasurer

Yours truly.
For Glenwood TV Association.
Robert M. Bradford



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