

The Commission should amend its rules to extend network and non-network territorial exclusivity, syndicated exclusivity, and network non-duplication protection rules to Low-Power, Class A, and Noncommercial Broadcast Stations. The failure to do so raises serious constitutional questions about the rules as currently applied to full power stations only. The comments filed to date unanimously concur that the Commission should amend the rules as requested. KM Broadcasting, Inc., urges the Commission to take such action to amend its rules expeditiously, as it is the only appropriate legal and equitable course of action in this proceeding, and it is long overdue.

Robert E. Kelly
President
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