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Larry Blakeney
Blakeney Communications, Inc.
P.O. Box 6408
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS TO:

MM Docket No. 01-317

MM Docket No. 00-244

Federal Communications Commission
Washington, D.C.

RE: RADIO STATION OWNERSHIP

As President of Blakeney Communications, Inc., licensee of WBBN(FM), WXRR(FM) and WKZW(FM) in the Laurel-Hattiesburg, MS radio market, I would like to express some thoughts and concerns from a small, independent, locally owned and operated broadcaster.

We are a family owned "Mom and Pop" group of radio stations. Every share of stock is owned by lifelong residents of our market area. I started in radio here at age 13. My wife, Debbie Blakeney, Sales Manager, began her radio career in this market at age 17. My brother, Randy Blakeney, GM and engineer, started in radio in this area at age 16.

We started our first station with very little money in a double-wide mobile home in a cow pasture, with cows grazing a few feet from the control room window (Really!). WBBN signed on the air in 1985 with 950 watts. We were later able to upgrade it to a Class C2 station. Today it is the #1 station in the market (Persons 12+, Arbitron Fall 2001) and has been for most of the past 12 years.

Citizens of the Laurel-Hattiesburg area see us on the street everyday and are able to communicate directly with the owners of our company their concerns and the issues and needs facing their communities.

In the 17 years since Blakeney Communications, Inc., began operation, both daily newspapers, both TV stations and almost every radio station in the market has experienced one or several changes in ownership, turnover in management and/or changes in format....except for WBBN and the other two stations aquired by Blakeney Communications, Inc.

We love radio and we love serving the Laurel-Hattiesburg, MS market area with the best quality radio broadcasting service possible. We have won a number of national awards in the past ten years including the Edward R. Murrow award for local radio news and the Country Music Association Radio Station of the Year Award, plus regional and statewide awards too numerous to mention here. We want very much to stay in broadcasting and continue serving the area we love.

As a result of the Telecom Act and the consolidation that followed, Cumulus was allowed to aquire 5 FM stations (four of which are high power FM's) and 2 AM stations in our market. Shortly thereafter, Cumulus sold all 7 stations to Clear Channel.

The result is that the three stations locally owned and operated by Blakeney Communications, Inc., now must compete with the seven stations owned by Clear Channel. The advantage is that Clear Channel has a station in virtually every conceivable format that is viable in the Laurel-Hattiesburg, MS market.

Blakeney, on the other hand, can only compete against Clear Channel in three formats. While we are holding our own just fine now, Clear Channel clearly has a huge advantage for the future.

When consolidation came to the Laurel-Hattiesburg market, we were operating two FM's and could only afford to aquire one additional station. Cumulus purchased seven stations and then sold them to Clear Channel.

Our greatest concern is that any rule changes being considered by the Commission might somehow lock in our market at the present ownership concentration due to the percentage of advertising revenue now received by Clear Channel and Blakeney Communications combined.

If you are going to allow Clear Channel to continue to own seven stations in the Laurel-Hattiesburg market, then the only way Blakeney Communications, Inc. can continue to be a viable competitor is to be able to acquire additional stations in the future when it becomes financially feasible.

If new Commission rules do lock in Clear Channel with a 7 station to 3 advantage over Blakeney Communications, Inc., and prevent Blakeney from achieving parity by acquiring additional stations, then the end result could be that the Blakeney's give up, sell out and go do something else for a living leaving the market with virtually no local ownership. It would certainly be easier than fighting an unfair fight.

If we toss in the towel, then the Laurel-Hattiesburg market will have not a single TV station, daily newspaper or high power radio station owned or operated by anyone in or near the Laurel-Hattiesburg, MS radio market.

To contemplate that scenario leaves us very sad.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Larry Blakeney", with a long, sweeping flourish extending to the right.

Larry Blakeney
President
Blakeney Communications, Inc.