

July 14, 2004

To Whom It May Concern As Relating to MB Docket No. 04-232:

My name is Jack Jacob and I am the Operations Manager for KJTY Radio, 1005 SW 10<sup>th</sup> Street, Topeka, KS 66604. We are a 100,000 watt station and a part of the Joy Public Broadcasting Corporation. It is my understanding that under subject Docket, you are considering a regulation that would require recording and storage of broadcast stations for the purpose of being able to investigate indecency complaints. I am submitting these comments as a means of encouraging you not to pass this regulation.

This requirement would place an incredible burden on this and every other small station throughout the nation as follows:

- (1) This requirement would cause the purchase of additional equipment including, at a minimum: One computer for recording and storing the broadcasts, tape backup or DVD backup equipment for the archival of broadcasts, audio capture software that would interface with the sound board, additional external and internal hard disks for storage.
- (2) This requirement would cause the following additional foreseeable expenses: the hiring of additional staff to process the recording and archiving, UPS for the recording device/computer to ensure all recording is made even when storm outages occur, a tracking system for filing and storage and the costs of backup media.

As listener-supported radio, this requirement would put another nail in an almost dead market in places as it would drive up costs in equipment, labor, opportunity and frustration.

Please vote not to pass this regulation as it is not an improvement to a system that is not broken. The complaints that are being filed for indecency should be substantiated by the person making the complaint and they can bear the cost of proposal.

For additional input on this matter, feel free to contact me at (785)357-8888.

J. M. Jacob  
Operations Manager