

Beverly Broadcasting Company, LLC
912 Forest Ridge Circle
Knoxville, TN 37932-2809
August 22, 2006

Re: RM-11338

Beverly Broadcasting Company, LLC is the licensee of standard broadcast station WRKQ, a Class D AM radio station licensed to Madisonville, Tennessee.

In the two years we have owned WRKQ we have attempted to provide a level of local service previously unavailable in Monroe County, Tennessee.

Both of the FM stations licensed to Monroe County are fully automated 24 hours a day with no local news and very little in the way of community service announcements. Both FM stations have their automations and de facto studios outside of Monroe County.

Little WRKQ on the other hand, airs local news every day. Since January 1, 2006, we have aired interviews with, public service announcements for, or promoted the events of over 100 local non-profit civic and educational entities, not counting churches.

Additionally, WRKQ has provided live election coverage of all county elections and municipal elections in each of the four towns in Monroe County, while the FM's have not.

We have also carried live coverage of sports involving two high schools and the local junior college. Other than football, all of these broadcasts are carried at a loss.

None of this is intended to besmirch the programming of our competitors or hold WRKQ to any higher standard. We are just following our instincts that locally oriented program are what small daytime AM stations must do.

However, with the limited nighttime power available to us (84 watts), it is difficult for us to provide the kind of coverage for our community that we would like. When a train de-railed near Sweetwater, Tennessee this spring, we were the only station to break in with coverage during the night. But unfortunately, no one in Sweetwater was able to hear our coverage. We have added Internet streaming to help people hear our election coverage after the sun goes down, but that is obviously not a replacement for being on the radio.

For several years, we have been hearing outcries about the consolidation of our industry and how there is no local community programming left, thus the need for low-power FM. I contend such service has been here all along from the many stand alone AM stations that struggle against FM competition and the laws of physics.

Beverly Broadcasting Company, LLC therefore concurs with the NAB's suggestion that limited signal AM stations be allowed to add fill coverage via FM to their 2 mv/m daytime contour.

Additionally, we suggest that the first window for such filings be given to stand alone daytimers that have no FM sister stations. Such AM-FM combos (or even AM-FM-FM trombos) would have substantially more resources to outbid a small station such as mine in an auction process.

After standalone AM's have had their chance to more fairly compete, then and only then, should windows be opened up for AM stations with FM sister stations or new Low Power FM applications.

Respectfully submitted,

Michael R. Beverly
Beverly Broadcasting Company, LLC
WRKQ-AM 1250, Madisonville, TN