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rock104fm.com



kz943.com



alive.fm

Comments by:

Larry Blakeney
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P.O.Box 6408
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TO:

Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
Attn: Chief, Media Bureau

Re: Report on Broadcast Localism and Notice of Proposed Rulemaking 04-233

Dear FCC Commissioners & Staff:

I respectfully offer the following Comments on the Commission's Localism Proposals on behalf of locally owned & operated Blakeney Communications, Inc. I suspect it will also represent the views of many local, independent broadcasters who have devoted decades of their lives providing local radio programming and services to their own communities and daily interact with the community leaders, officials, listeners and other member of the public in their coverage areas.

First of all, on behalf of the many local broadcast owners who decided to turn down millions offered by Clear Channel, Cumulus and others to stay and serve their local communities when it would have been easier to "take the money and run"; thank you for now proposing to "punish us for the sins of Clear Channel, et al". Had we known at the time that the Federal Communications Commission itself would turn against the local operators who are the very backbone of the industry and seek to pile such burdensome regulations on our backs, making it impossible for us to continue serving our communities, we would have exited the industry while our stations were still worth something.

At the very least, you should be seeking a way to reward local owners for exceptional service to their communities and for investing years of their lives and millions in studio facilities, transmitter facilities and equipment to maximize their ability to serve their communities. You should be eager to exempt local

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owners who reside within their communities from any such proposed burdensome regulations and reporting requirements and perhaps even allow them to own more stations in their market than nationwide group owners who are now "grandfathered" with more signals than local owners are allowed to own in some markets.

MAIN STUDIO PROPOSAL:

Reinstatement of archaic rules that the main studio be located within our communities of license would be disastrous to our company and business and would probably put us out of business. It is doubtful that any bank would loan us the \$800,000 to \$1 million that would be required to relocate four separate studios from our centrally located state of the art facilities in a metro area of 158,900 and TSA of 303,000 to small towns with populations of 1,341, 789 and 1,038 respectively; double or triple the size of our staff and build four new STL towers. The banks would find that to be an absurdly ridiculous business model especially when they looked over our financial statements and the retail sales tax collections of those towns.

Being centrally located with access to high speed internet and broadband capability (not available in these small communities of license) actually allows us to even better serve the communities of license, particularly in severe weather or emergency conditions. With main studios located at 4580 Highway 15 North in Laurel, Ms and 6184 Highway 98 West in Hattiesburg, (metro population 158,900 ages 12+) we are able to utilize our close proximity to the state-of-the-art, high tech Emergency Operations Centers in the cities of Laurel and Hattiesburg to better serve the residents of our communities of license than we would be if we were actually located in those small towns, which have no such facilities and actually rely on the Laurel and Hattiesburg EOC's, Red Cross, United Way Chapters, phone companies, airports, Junior and Senior Colleges, medical facilities, employers, newspapers, etc...for most of their information and services. High Speed Internet allows us to provide emergency information much more quickly to these communities of license which don't even have very reliable cellphone service much less extensive broadband capability. The smaller communities depend on the centrally located Emergency Operations Centers in Laurel & Hattiesburg, the "regional radio stations" such as ours and regional daily newspapers and TV stations for information. They depend on the centrally located Hattiesburg-Laurel Regional Airport for air travel.

WBBN, the top rated country station in the market is known as "Pine Belt Country B95". While WBBN's community of license is "Tylorsville" and while I, Larry Blakeney, CEO of Blakeney Communications, Inc. was born and reared in Tylorsville and graduated from Tylorsville High School; I can tell you better than anyone else that WBBN could not even pay its electric bill on the advertising revenues that are or would be derived from Tylorsville were we to relocate our main studios there. Forcing WBBN to move its main studios to Tylorsville would actually weaken and diminish its ability to provide emergency information and programming services to the 158,900 persons (ages 12+) in our metro area and 303,000 persons (12+) in our TSA (as well as in the communities of license) who depend on WBBN (#1 rated station, winner of the national Edward R. Murrow Award for local radio news, 2 time Mississippi Assoc. of Broadcasters Station of the Year and former national winner of Country Music Association Small Market Radio Station of the Year Award) for news, weather, information and entertainment.

The reason WBBN grew to become the #1 radio station in our market over most of the past 23 years is that we did a better job of serving our market than the stations actually licensed to Laurel & Hattiesburg. Thus the free marketplace of the entire region chose us over all the other stations as their preferred source for entertainment, news and information, not just the one small town where we started. We have become an important cultural institution in the region and the first place on the dial that listeners tune to when severe weather strikes or there is breaking local news!

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Under the FCC proposal, WBBN would be relocated 20 miles away from Laurel and 45 miles away from Hattiesburg via dangerous 2 lane Highways. These distances would separate us and our staff of approximately 25 from reliable cellphone service, high speed broadband internet services and the Emergency Operations Centers in Laurel & Hattiesburg. We would also be many miles of dangerous, curvy, hilly two-lane travel away from community leaders, public officials and listeners who regularly visit our present, centrally located, state of the art studio facilities.

DO THE MATH! In the interest of having us be more accessible to the 1,341 persons in the community of Taylorsville (my hometown), the FCC would have us make 100,000 watt WBBN virtually inaccessible to the other 157,559 persons in our metro market area and 301,659 persons in the Pine Belt region (TSA) including community leaders, officials and listeners, EOC Directors, etc. I would never be likely to run in to any of these community leaders at restaurants, meetings and community events or the mall as I frequently do now.

We would also be virtually inaccessible to the community leaders, public officials and listeners of the approximately 70 other incorporated cities and towns and unincorporated major communities and hundreds of other unincorporated minor communities within our listening area. With our state of the art main studios now centrally located in the market area, we are convenient to most of these community leaders, public officials and listeners, even those from our community of license of Taylorsville, who visit Laurel and/or Hattiesburg at least once a week or more to shop, dine, conduct business, etc.

The same scenario would apply to relocation of the main studios of WKZW to Sandersville (population 789) and WXHB to Richton (population 1,038). I am frankly surprised that the FCC would even consider disrupting the efficiency and technical capability of high power, regional radio stations such as these by moving them to small communities where they would have less access to today's technology to serve even their own communities of license.

It would be extremely unfair, inefficient and contrary to the public interest to force high power, regional stations such as ours to relocate and superserve small towns such as Taylorsville (my hometown), Sandersville and Richton, while diminishing service to the 70 other small towns and unincorporated major communities within the listening range of our stations, when the Commission has no channels, either AM or FM, available to allocate to most of these communities.

The fact is that marketplace forces have made most FM stations regional media, providing news, entertainment and emergency information not just their communities of license, but to entire regions made up of multiple communities (whether it be an entire county, an entire trade area or Arbitron market area). Marketplace forces have filled the need for regional news and information to hundreds of small communities in our area and given them multiple choices for whatever type of music, entertainment or information they may be in the mood for. These needs have been filled by the marketplace in spite of the FCC's antiquated, outdated and archaic system of allocations to communities of license that dates back to the days of 500 and 1,000 watt AM stations that barely covered one whole community and the first FM stations with 100 foot antennas operating at fraction of the maximum power and antenna heights for their class.

The FCC has also previously recognized such marketplace forces when it has auctioned off hundreds of new FM channels for hundreds of thousands or even millions of dollars each. While these channels were allocated to small communities, the Commission itself listed beside each one a bigger city nearby in which the high bidder could locate its studios and probably bill more than the retail sales of the entire community of license. It would seem to me that since the Commission itself advertised these vacant channels as being part of larger nearby markets, it should be liable to return the money to successful bidders who could now be forced to locate their main studios in small communities that can't produce a fraction of the advertising revenue required to operate a radio station.

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Re-instatement of the Main Studio Rule would be financially disastrous to Blakeney Communications and many other broadcasters that I have spoken with. These rules would ultimately disrupt vital communication services to the listening public and the communities we serve. We would estimate that the total investment in our present, state-of-the-art, centrally located main studio facilities would be in the vicinity of \$800,000 to \$1 million. It would simply not be feasible or profitable to relocate all four of our high power, regional FM stations to studio facilities within their respective communities of license. It would probably cost \$200,000 to \$250,000 per station (for very minimal studio buildings and facilities) and would require construction of four new STL towers, four studio buildings and four times the equipment in many cases.

We would have to double or even triple our staff and payroll and still would not be able to provide the quality programming services we now provide because we would be moving away from the economic and business center of the community. Add to extra payroll the inefficiencies of operating four separate studio facilities such as increased utilities, travel expenses, etc. and you have a recipe for financial disaster.

If the Commission should pass these rules and require Blakeney Communications to construct multiple studios to provide the exact same services from small towns scattered miles apart, we would have not be able to continue in business. I suspect hundreds of local operators would either sell out to large national groups (if they could find a way to meet the rules through creative circumvention or economies of scale) or just go dark thus eliminating vital information and emergency services. How ironic it would be if the Commission's "Localism" rules should actually result in local owners leaving the industry in droves. I suspect that is what will ultimately happen and that large national chains will find a way to roll out instant, modular main studios that meet the letter of the rules but don't actually provide the kind of local service the Commission has in mind. With today's declining radio revenues, however, I doubt if even the large radio groups could be profitable under such proposed reregulation of the industry.

When I have discussed the FCC Localism proposals with other area broadcasters, community leaders and businessmen, I was surprised to hear a common theory that these rules may be a smokescreen for driving small, local, independent operators such as us out of the business altogether. While I don't agree that this is the Commission's intention, I certainly agree that this will be unintended result.

While the Commission may believe that these main studio rules would be for the public interest, convenience and necessity for Taylorsville (my hometown), Sandersville and Richton, Mississippi (combined population less than 3,000 persons); they would actually be contrary to the public interest, convenience and necessity of the 70 other towns and communities, hundreds of minor communities, 158,900 metro listeners and 303,000 TSA listeners within our region and market area.

Other broadcasters in our market who would also have to relocate their main studios include African American owned Unity Broadcasting which would have to relocate WGDQ(FM) from Hattiesburg to Sumrall, Mississippi. Also TeleSouth's WFMM(FM) would have to relocate from Hattiesburg to Sumrall. (Sumrall, Mississippi, population 1,005 persons would now have two FM radio station main studios within its town limits, while they now only have to drive about 8 to 10 miles to reach these stations. In fact there would be more radio stations in Sumrall than places to eat!!!...while Hattiesburg, one of Mississippi's largest cities would lose these two stations and several more). Clear Channel would have to relocate five of their seven stations from Hattiesburg to smaller surrounding towns and WMXI(FM) would have to relocate from Hattiesburg to Laurel.

Thus the net result of the proposed main studio rules would be that Hattiesburg, which often ranks third in Mississippi in retail sales and is the economic, employment, medical and education center of the Pine Belt region of Mississippi, would lose eight radio stations. I would like to see the FCC explain to the

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Mayor and Board of Aldermen, the Forrest County Board of Supervisors, the Forrest County Emergency Operations Center and the Area Development Partnership exactly how the "LOCALISM" Rulemaking has served the public interest, convenience and necessity of Hattiesburg and the Pine Belt by taking away almost all of its radio stations from the business center of the region and moving them to small towns that cannot support them.

24-7 OPERATOR ON DUTY:

With combined, centralized studios, we now have an operator on duty 24-7, 365 days a year to answer the phone and relay emergency information. However, should the Commission require us to relocate our main studios to our communities of license, it would no longer be feasible to have an operator on duty on nights or overnights at four separate sites. I suspect we would have to discontinue operations and sign off the air in the evenings and overnights. (That is assuming that we were even able to stay in business which appears doubtful).

ADVISORY BOARDS:

Having a local advisory board would be "horse & buggy" compared with the lightning speed of today's technology which we use to keep in constant contact with our community leaders, officials and listeners. It would be very time consuming to form an advisory board. Conducting and documenting advisory board meetings would take away valuable time and energy from actually serving our market. This would be a mere formality and would serve no real purpose other than the waste of time and valuable man hours. We receive phone calls and e-mails every day from community leaders, officials and listeners who need our stations to relay information or publicize community events. Every Mississippi community leader and public official that I know would be insulted to know that the Localism proposals assume that they are too stupid to phone, fax or e-mail the owner or manager of the local radio station when they need coverage, publicity or the broadcast of urgent information.

In today's technological age of instant communication, I would venture to say that all community leaders and officials know how to contact us with just a click on their computer, by checking the yellow or white pages or by calling information. If they listen to any of our stations at any time, they are constantly reminded of our station websites and our area online directory, "thepinebelt.com", where they can instantly find contact information for all of our stations or e-mail us with the click of a button.

We air announcements several times each day during all dayparts driving listeners to our station websites: b95country.com, rock104fm.com, kz943.com and PineBeltSolidGospel.com as well as our online area directory "thepinebelt.com." Each site has extensive contact information including e-mail addresses for all management, sales and on-air personnel. We receive hundreds of e-mails each month from listeners, community leaders, public officials, and citizens from all walks of life from throughout our coverage area.

Our websites also give phone numbers and mailing addresses to contact us as well as the physical location of our stations. In addition, our owners reside physically within the coverage area of our stations and interact daily with community leaders, public officials and listeners. The other members of our management and programming team, sales staff, engineers, radio personalities, news director and other staff members reside in various cities, towns and communities within our station coverage areas and have constant daily contact with community leaders, public officials and listeners daily in restaurants, on the street, in the malls, club meetings, civic organizations, news conferences, church, remote broadcasts and generally just out and about in the community. Any staff member who has contact or receives

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feedback from anyone in the community regarding programming, covering community events, providing publicity for causes or coverage of emergency information, relays that information to other staff members who need to know and/ or management via cellphone, text, e-mail, etc. When someone e-mails a public service announcement to our stations or to thepinebelt.com, that e-mail is automatically forwarded to the General Manager, Public Service Director and Promotions Director. Requests for publicity, live remote coverage of events, etc. are routinely forwarded to several staff members who need to be aware of such contacts from the community.

In addition, all public service announcements aired by our stations remind listeners that for more information, they can "go to thepinebelt.com and click on calendar." There they will find contact information and usually more detailed information. This information is updated daily and sometimes more than once a day.

It is now easier than it has ever been in my nearly 40 years in broadcasting to contact us to request that we air a public service announcement or to request that someone be a guest on one of our morning shows to talk about upcoming community events, causes, etc. We can usually handle e-mail requests and contacts to get public service announcements, news or urgent information on the air or even book appearances almost instantaneously. Sometimes these e-mails result in phone calls, a station visit or even having lunch with community leaders, officials or interested persons to discuss how the stations can better serve them.

We are able to maintain contact with community leaders from the various communities throughout our coverage areas in all demographic and racial groups and walks of life through this informal, casual contact and by attending various meetings, functions, club meetings, events, etc. We have received special recognition and awards from such groups as the United Way of the Pine Belt Region, The Martin Luther King, Jr. Birthday Celebration Committee, The American Red Cross, Area Development Partnership and many, many, many others! Our walls are covered with awards and recognition and our files are full of letters of appreciation too numerous to list here for our service to the community. (See attached sample of unsolicited letters and awards).

During the past few months, we have had such live guests on our morning shows from our communities and/or counties of license as Sheila Bryant with Smith County's Raleigh Festival, the Watermelon Queen and officials promoting the Mize Watermelon Festival, Connie Smith with the Pink Lemonade Tea for Think Pink Day (Breast Cancer Awareness) in Taylorsville and American Red Cross Director Peggy Owens-Mansfield whose district includes two of our communities of license. We have broadcast live from community events too numerous to mention here. Just a few examples of live broadcasts from our communities/counties of license include the Smith County Relay for Life, the Pecan Festival in Richton, the Jones County Relay for Life, the Smith County's Raleigh Festival, the Taylorsville & Sandersville Christmas Parades and many others.

As I mentioned earlier, having a community advisory board and would be "horse & buggy" communication in the year 2008. It would also be very time consuming and the organization of such meetings and the paperwork required to document them would take valuable time away from actually serving the community. My wife, Debbie Blakeney, who is our General Manager, I (Larry Blakeney, CEO) and our 25 very dedicated employees would have to completely reprioritize our schedules, reallocate resources and eliminate many things we now do for the communities we serve in order to document those categories of local programming content which the FCC may deem most important.

Unfortunately, the practical, real world result of such Advisory Boards and content reporting would be burdensome government regulations and paperwork for hard-working local, independent broadcasters and an erosion of the First Amendment right to freedom of speech.

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If radio and television broadcasting had existed at the time our Constitution and the Bill of Rights were created, Freedom of the Press would have read "Freedom of Radio, Television, Electronic Media & Newspapers". Under no circumstances would Thomas Jefferson and the founding fathers have allowed the FCC to require that broadcast stations follow the advice of advisory boards or report their local programming content to the Federal Government; thus having their freedom of the press and freedom of speech censored by a fear of failure to please either their advisory board or the FCC (whether consciously or subconsciously).

In fact, according to the online encyclopedia Wikipedia under "Freedom of Speech/United States":

"During Colonial times, English speech regulations were very restrictive. According to the Star Chamber, the King was above public criticism and statements critical of the government were forbidden."

"Until 1694, England had an elaborate system of licensing. No publication was allowed without the accompaniment of a government granted license."

The very reason for the First Amendment was to protect the United States from such attempts to erode Freedom of Speech and Freedom of the Press as these very advisory boards and program content reports now being proposed in the name of localism.

I was a member of advisory boards (similar to those proposed by the Commission) for local offices of the Mississippi Extension Service (County Agents, 4H Youth Agents, etc.) as well as the Jones County Schools Parent Advisory Board. While I did get a free meal occasionally or donuts and coffee and a chance to visit with some very nice and capable people, the advisory board meetings consisted of nothing more than each agent or school official giving board members a brief summary of what they are doing and projects in planning or underway. It was very rare that there was even time for questions or input from the advisory board members. The main purpose of these meetings was simply so that the Extension Service and School Office could document that they indeed took place...in other words bureaucratic paperwork that served no purpose other than to say "we have an advisory board" which met on a certain date. In reality, if I really needed something from the Extension Service or school, I could get more done by picking up the phone and talking to them one-on-one when they weren't busy putting on an advisory board meeting. They are very responsive to such calls and advisory board meetings served no real purpose.

Besides, an advisory board would consist of such a small representation of the 18 counties which we cover all or part of and over 70 cities, towns and unincorporated major communities that we serve, that it would be completely ineffective and unrepresentative of most of our coverage area. As previously stated, having an advisory board from a small community of license of 1,000 or so persons tell us how to program these stations would not be representative of or fair to the other 150,000 metro listeners and 303,000 market area listeners who consider us their "hometown station", too.

Besides, the Arbitron ratings serve as a very important advisory board already. Every household surveyed is asked to submit comments about local stations along with their diaries and they are not shy about telling us what we are doing wrong or doing right.

We also operate four separate hospitality booths (for WBBN, WXRR, WKZW & WXHB) which are open for each of the ten days of the annual South Mississippi Fair (we've been doing this for 23 years). The booths are located side by side at a prime location on the midway and staffed with management personnel, DJ's, account executives and other station staff members each day of the fair. These station staff members greet and visit with the public, listeners, community leaders and public officials from

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throughout our coverage area including our communities of license. Many of them share with us their likes and dislikes about our stations and we receive many requests for publicity or coverage of other events through these contacts. Annual attendance is approximately 85,000.

We do the same at Hubfest, a major street festival held annually in Hattiesburg (one of our communities of license). An estimated 35,000 attend Hubfest and we meet and visit with many community leaders, officials, listeners and members of the public.

Another example is the Okatoma Festival which draws an estimated 30,000 from throughout our coverage area.

WBBN, WXRR, WKZW and WXHB are also sponsors of and broadcast live from our very prominent booth at the Great Pine Belt Expo at the Hattiesburg Convention Center, the area's annual business & industry expo which targets primarily business and community leaders from all communities in the region. The event opens each year with the exclusive and free (by invitation only) "Taste of the Pine Belt" which draws an estimated 800 top civic and business leaders and public officials (including those from our communities of license). Blakeney Communications operates the Pine Belt Radio Booth in the most prominent location at the entrance to the Expo and our owners, management team, radio personalities, news director and account executives greet and visit with virtually all of these community leaders at this annual event. We provide them with contact information for our stations and gladly accept their suggestions and comments regarding our stations.

REPORTING OF PLAYLISTS AND LOCAL CONTENT:

Our small market radio staff works very hard to meet the local needs of our community, whether it's broadcasting live for the Relay for Life, the local Business & Industry Expo, the Sertoma of Laurel Christmas Parade, or one of hundreds of other community events and causes throughout the year.

My wife, Debbie Blakeney, serves as our General Manager, Sales Manager and Webmaster. Those are only three of her many jobs. Several other members of our staff each perform jobs that would be handled by two or three people in the major markets. Any additional record keeping and reporting would require at least one additional staff member that we cannot afford.

I would estimate that a minimum of one additional full-time person would be required to at a minimum cost of \$30,000.00 per year and possibly as much as \$42,500 per year to handle the additional paperwork burden of reporting the compiling of local music playlists and local programming content and placing our public inspection files on our station websites. There is a good chance that even with this additional full-time employee salary we would still need outside help at even more cost to post our public files on the internet.

This is money that would take away from the programming services we now provide! Many small town radio stations only have one or two employees on staff! The proposed paperwork and internet posting will drive many of them out of the business and leave a number of small towns without a radio station.

The requirement to report programming and music playlists itself amounts to government censorship and infringement of the First Amendment, because there exists the implied expectation that broadcasters meet certain music and programming expectations and criteria whether they actually exist or not. Whether, consciously or subconsciously, broadcast licensees will alter their programming and music selection or free speech decisions to meet whatever these implied programming expectations may be in order to stay out of trouble. I know that our programming decisions and thus our free speech for WBBN, WXRR, WKZW and WXHB will inevitably be altered by the subconscious desire to please and stay out of trouble with the FCC and appease organizations who might otherwise cause us license renewal trouble.

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Thus, the first amendment will have been violated and what should be free speech has been altered by the intimidation that exists under an FCC that is “watching over your shoulders like Big Brother.”

In addition, I feel that such additional record-keeping would drive many Mom & Pop operators such as us out of the broadcast industry altogether. If that happened, it is doubtful that another local operator would be able to outbid a larger, out-of-town group for our stations. Thus, the FCC would have hurt rather than helped local radio and localism.

Although, we now grant many thousands of dollars in free airtime to and broadcast from and on behalf of many, many worthy community events, causes, etc. each year; as a local, independent broadcast owner, I would have to think long and hard about whether I really want to stay in this business, should the FCC require us to grant free airtime to any group that requests it and open up the floodgates for events and causes that our community would deem objectionable.

Regarding local music and local artists, WBBN, our highest rated station produces and hosts a local COLGATE COUNTRY SHOWDOWN, which is a talent contest that helps promote local artists and gives them valuable experience in recording and performing before a large crowd. We usually get about 50 to 60 entries in our preliminary competition and the final 18 contestants get to perform in the local finals held the first Saturday in June in the Magnolia Center at the South Mississippi Fairgrounds. The 18 finalist receive much local recognition both on the air and on our websites. The top three receive trophies and cash prizes and the local winner advances to the state finals.

We have been producing and hosting this local showcase of talent for the past 22 years. During that time, WBBN has had one national winner of \$100,000 cash and a record contract, two contestants signed to major record labels, over a thousand contestants who gained valuable experience in recording their initial entry tapes or CD's and nearly 400 contestants who have gained valuable experience in live performance and stage presence.

When the winners and other top contestants have been exceptional and worthy of airplay, we have occasionally featured their music in promos and/or played their songs on the air. This contest is held annually by hundreds of radio stations around the country. These stations give opportunities for exposure and experience to thousands of aspiring artists nationwide. You can get more information at www.colgatecountryshowdown.com. This is the largest talent contest in the world and pre-dates American Idol by more than two decades.

Aside from the Colgate Country Showdown, we are always willing to listen to music provided by local artists. We don't play every song that is delivered to our station, but we have, on many occasions played local artists, when their talent, recording quality, uniqueness and/or entertainment value have been up to the standards expected by our listening audience thus allowing us to remain competitive.

In the year 2008, everyone's home computer can now be a recording studio and everyone can be a recording artist. That doesn't mean our audience wants to hear every song by every local person who thinks he or she should be played on the local radio station.. Trust me, the FCC Commissioners themselves would be the first to “gong” many of the local recordings we receive.

It's just a matter of talent, quality and entertainment value. If we judge that the song has certain local appeal and the quality is up to today's standards (that our audience expects and demands), we'll give it a spin and let the audience decide.

We compile our playlists locally. While we do study music research available to us online, we use a lot of interaction and feedback from our local audience through our featured all-request shows, e-mails and guestbook entries as well as a lot of gut instinct that seems to have served us well. The Arbitron ratings

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are the way we keep score of whether we are meeting the expectations of our audience.

Reporting our playlists to the Commission or even reporting our methodology for compiling playlists would probably cause us to alter our methods and judgement, whether consciously or subconsciously, to stay out of trouble and below the radar of the new "Playlist Police" and would thus be violation of the First Amendment.

I would strongly urge the FCC to steer clear of what will surely be a dangerous erosion of Free Speech and Freedom of Expression in America.

Besides, in an age where every local aspiring artist can post his or her music on the internet and share it with the world, every local high school and community college can stream their local sporting events not just to the community but worldwide, every 12 year old can program his or her own personal radio station on an I-pod or the internet, people in the community who want to change the status quo can communicate directly with each other and the masses via the internet, grade schoolers can text breaking local news out to the entire community faster than we can get it on the radio; yes, in an age where local radio stations will soon be streaming two or three additional radio stations per channel via HD Radio and/or FM Extra (via subcarrier), when I can tune in 500 TV channels on my home cable and watch whatever specialized niche programming I desire, when I can tune in thousands of internet radio stations and watch thousands of productions by the average Joe on YouTube; yes, in an age where there are thousands and thousands of channels of instant, mass communication (through various media), when I can communicate with anyone I want to at the speed of light worldwide; it is absolutely amazing that we are even having this debate on whether to turn the clock back several decades on broadcast regulation and make a dangerous encroachment on Freedom of Speech, when speech has never in history been more widely and freely disseminated than it is in the year 2008.

Amazing!

COMMON SENSE:

If I may inject a little common sense into this absurd rulemaking proposal, may I suggest that since the communication between local authorities and the radio stations in Minot, ND, precipitated this whole rulemaking, that the Commission address specifically and only that issue. The only additional paperwork required would be a one-sheet perhaps every two to four years in which broadcast stations certify that they have exchanged contact information such as cellphones, hotlines, etc. with local Emergency Operations Officials, Sheriff's, Police Chiefs, Fire Chiefs, etc.

By so doing, you can ensure that radio management and authorities can reach each other instantly in an emergency and disseminate emergency information to the public. Problem solved (if it even exists) without the FCC having to trample on the Constitution and the First Amendment and reek financial disaster and burdensome regulation on the entire broadcast industry.

Respectfully submitted,

Larry Blakeney
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WBBN/WXRR/WKZW/WXHB
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March 12, 2008

Larry and Debbie Blakeney
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Laurel, MS 39441

Dear Larry and Debbie,

On behalf of United Way of Southeast Mississippi, the Greater Hattiesburg Home Builders Association and Leaf River Cellulose, we want to thank you for the publicity that Blakeney Communications gave our 6th Annual Home Sweet Home Raffle. Since the beginning of this project several years ago, your radio promotion has been a reason for the raffle's success, and we are extremely grateful to you. We appreciate the public service announcement that you produce and the large amount of coverage you provide. We also want to thank you for the live remote you aired from the house and the information you provided on your website and in your newsletter.

Thanks to your help, our raffle was the biggest success yet! We sold almost 4,500 tickets! This project raised a substantial amount of money for our 21 United Way agencies here in our community. We couldn't have done it without the help of caring people like you.

We appreciate your support in this project and all that you contribute to our community. Thanks again.

Sincerely,

Dan Kibodeaux
Executive Director

Brooke Bryan
Campaign/Communications Coordinator

Our Mission Statement: *To improve lives by leading and mobilizing the caring power of Southeast Mississippi.*



LAUREN ROGERS MUSEUM OF ART

August 29, 2007

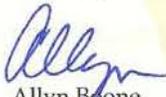
Ms. Debbie Blakeney
Rock 104
P.O. Box 6408
Laurel, MS 39441

Dear Debbie:

The 2007 Blues Bash at the Lauren Rogers Museum of Art was one of the most enjoyable ever, and we are indebted to you for your continued support as a Blues Bash sponsor. Thanks to the generosity of friends like you, we are able to return a high percentage of the Blues Bash proceeds to our community for our innovative education programs.

Thank you again for your sponsorship of Blues Bash. We appreciate your support of the Museum and your commitment to our community.

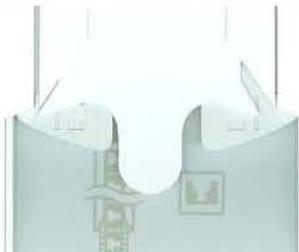
Sincerely,



Allyn Boone
Director of Development

565 North 5th Avenue • Post Office Box 1108 • Laurel, Mississippi 39441-1108
Phone (601) 649-6374 • Fax (601) 649-6379 • www.lrma.org

Accredited by the American Association of Museums



COVINGTON COUNTY CHAMBER OF COMMERCE

“PROGRESS WITH PRIDE”

September 16, 2005

Blakeney Communications, Inc.
Mr. Larry Blakeney
P O Box 6408
Laurel, MS 39441

Dear Larry:

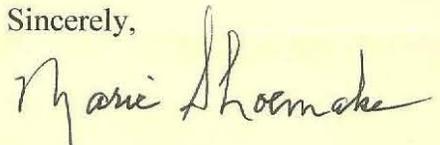
I want to personally thank you for the confidence you've placed in the Covington County Chamber of Commerce. It is no secret that our continued success is reliant upon your continued participation as a Chamber member. We received your financial investment of \$110 for 2004-2006 and appreciate your support.

Though Katrina hit Covington County hard and things are tough, the resiliency of our people and the kindred spirit is encouraging and positive. The Chamber must focus on the future and continue to work together for the economic and community development of Covington County and South Mississippi. If the Chamber can assist in anyway, please notify me.

The radio station did an outstanding job in keeping us informed. Hats off to all your staff for a great job!

Enclosed is your membership plaque. Again, thank you for your support.

Sincerely,



Marie Shoemake
Executive Director

Enclosure



THE UNIVERSITY OF SOUTHERN MISSISSIPPI

SOUTHERN MISSISSIPPI SYMPHONY ORCHESTRA

July 13, 2007

Debbie Blakeney
WBBN WXRR WKZW WXHB
P. O. Box 16596
Hattiesburg, MS 39404

Dear Debbie,

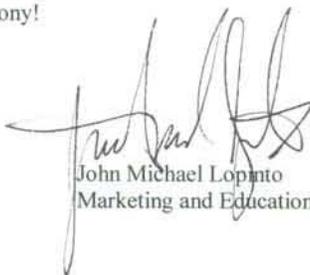
It has been a while since *United in Song*, our concert with Southern Miss alumna Tena Clark, Patti LaBelle, Dionne Warwick, and so many more talented artists. I apologize for the lateness of this note, as I have since gone on to several other projects here at the orchestra. But I want to thank you for donating advertising time on your radio stations in the weeks leading up to the event. Adequate funding for publicity is always an issue for us when we have an event of this size and importance, and you have helped us with a perfect solution. The commercials you produced were of a high quality, and we could not have asked for more.

Again, please accept my most sincere heartfelt thanks for the wonderful support you have shown to me and the Southern Mississippi Symphony Orchestra. If I can be of any assistance to you, please do not hesitate to contact me at 601.266.4001 or jam.dean@usm.edu.

See you at the symphony!

Yours truly,

Jay Dean
Music Director



John Michael Lopinto
Marketing and Educational Outreach Coordinator

118 College Drive #5081, Hattiesburg, Mississippi 39406-0001
Tel: 601.266.4001 Fax: 601.266.4039 usm.edu/symphony symphony@usm.edu





July 16, 2007

Debbie Blakeney
B-95/Rock 104/KZ 94/Gospel 96.5
Post Office Box 6408
Laurel, Mississippi 39441

Dear Debbie,

Thank you for the sponsorship of B-95, Solid Gospel 96.5, Rock 104 and KZ 94 for the 2007 Fireworks Celebration held July 3rd. The 30 second spots that ran on all four stations were of great value in publicizing each of the sponsors. In addition, we appreciate the opportunity to talk about the Fireworks Celebration on the morning shows.

I hope you will consider sponsoring the event again next year. This family oriented event has had a positive economic impact on Laurel and Jones County businesses. With your continued support, we hope this event will grow and contribute to our community for many years to come.

Sincerely,

Bill McMullan
General Manager

Phone (601) 426-6321 • FAX (601) 426-2693 • 910 Sawmill Road, Suite 219 • Laurel, Mississippi 39440

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Kelli Robertson David Welen
Joshua Crosser Jacob Hillson

Jami Steen
Kayce Williams
Jade Williams
Diane Butler

Hollie Smith
Natalie Flynn
KIANAC
Gravin

Hannah Booth
Aris E. Bunsdon
Shalynn Gartin
THANKS!

We appreciate all you do to help publicize the South Jones Show Choir

Melody
Ashley Barber
"COMPANY"

Jonathan McKenzie & "COMPANY"

J. McKenzie
Anna Booth



Larry Blakeney

From: Debbie Blakeney [debbieb@c-gate.net]
Sent: Thursday, August 16, 2007 5:34 AM
To: LARRY B; Tom Freeman; Doug Morris
Subject: Fw: Thanks from Metro Crime Stoppers

----- Original Message -----

From: Diane James
To: getlinked@thepinebelt.com
Sent: Wednesday, August 15, 2007 12:24 PM
Subject: Thanks from Metro Crime Stoppers

Dear Pinebelt owners and staff,
Thanks so much for your support. You all sent me an email a while back notifying me of your services that you offer. I apologize for not replying sooner. I recently did a Google search and found all of the wonderful things you have written about Metro Crime Stoppers. Thanks again for all of this coverage you are giving to Metro Crime Stoppers, as we are non-profit and on a tight budget. Please feel free to contact me if I can be of assistance to you or yours.
Diane James
crimestopperlady@comcast.net
601-582-STOP(7867)

Building a website is a piece of cake.
Yahoo! Small Business gives you all the tools to get online.

8/16/2007



"WE ARE UNITED IN
A COMMON MISSION:
MAKING A DIFFERENCE
TO PEOPLE."

—ELIZABETH DOLE

IN GRATEFUL APPRECIATION
FOR THE CONTRIBUTION OF

WBBN - B95

TO THE HUMANITARIAN WORK
OF THE AMERICAN RED CROSS

Media Support

**Pine Belt Chapter
Laurel, MS**

August 15, 2007



American
Red Cross

