

BEFORE THE
Federal Communications Commission
WASHINGTON, D. C. 20554

In the Matter of)
)
Broadcast Localism) MB Docket No. 04-233
)
Digital Audio Broadcasting) MB Docket No. 99-325
Systems and Their Impact on)
the Terrestrial Broadcasting)
Service)

TO: Honorable Marlene H. Dortch
Secretary of the Commission

ATTN: The Commission

JOINT COMMENTS

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CAUSE PLUS MARKETING, LLC
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PUTBRESE COMMUNICATIONS, LTD.
ST. GABRIEL RADIO, INC.
REDWOOD FAMILY SERVICES, INC.
EL SEMBRADOR MINISTRIES
FRANCISCAN UNIVERSITY OF STEUBENVILLE**

April 28, 2008

SUMMARY

The Joint Commenters are either existing terrestrial radio licensees or are acquiring terrestrial broadcast licenses. All of them are broadcasters of Roman Catholic educational and inspirational programming; most of them are non-profit entities.

Simply stated, the Joint Commenters oppose any attempt by the Commission to reregulate the broadcasting industry. Our comments trace historical events and actual cases in broadcasting over the past 40 years to show that, through experience, the federal government wisely deregulated terrestrial broadcast radio in the early 1980s, and that it would be both retaliatory in nature and an overwhelming financial burden to smaller broadcast organizations, such as Joint Commenters, to reimpose the regulatory regime that existed prior to 1981.

Joint Commenters do, however, support the initiative of the Commission to permit the programming of AM stations to be broadcast on local FM translator stations.

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warehoused AM Broadcast Stations and have revived them through the broadcasting of Roman Catholic educational and inspirational programming. In contrast to the burlesque-style programs that take place on many other radio stations in the nation, Joint Commenters broadcast clean, family-friendly, heartwarming, educational and inspirational programs that have served the public interest.

2. Joint Commenters have done this through stretching every available dollar, and through efficiencies which meet existing Commission rules and regulations while conserving scarce resources. Joint Commenters are fearful that any attempt to re-regulate the broadcasting industry will saddle them with, in the great scheme of things, needless regulatory compliance costs in time and money that they simply cannot meet. Therefore, in the name of the "public interest", the Commission could possibly cripple if not terminate many religious-oriented broadcast stations through the imposition (or re-imposition) of the type of regulations and paperwork that existed in the broadcast industry prior to mid-1981.

"Scarcity" Is No Longer a Factor

3. The rationale under which the United States Supreme Court has validated the Commission's regulation of the broadcast industry is "scarcity" of frequencies—that is, there are more people who wish to broadcast than there are

available frequencies to accommodate them. See e.g. **Turner Broadcasting System, Inc. v. FCC**, 512 U.S. 622, 637-38 (1994).

4. Broadcasting was "de-regulated" in mid-1981 by actions of both Congress and the Commission then headed by Chairman Mark Fowler. At that time Congress extended the terms of radio station licenses from three to seven years, and the Commission did away with things such as mandatory program logs and minimum percentages of news, public affairs and other non-entertainment programs, and instituted the "postcard renewal" form.

5. According to the 50th Anniversary Issue of **Broadcasting** magazine, October 12, 1981, its "For the Record" section (p. 110) reported that as of August 31, 1981 there were 4,617 licensed AM stations, 3 AM stations operating on special temporary authorization (STA), and 130 unbuilt AM construction permits, for a total of 4,750 authorized AM stations. That same issue also reported that as of August 31, 1981 there were 3,328 licensed FM stations, 2 FM stations operating pursuant to STA, and 185 unbuilt FM construction permits, for a total of 3,515 authorized FM stations. As of that same day, August 31, 1981, there were 1,110 licensed non-commercial educational FM stations and 65 unbuilt construction permits for such stations, for a total of 1,175 authorized non-commercial educational FM stations.

Thus, as of August 31, 1981, there were a total of 9,440 authorized broadcast radio stations across all 50 states and jurisdictions subject to the Commission's ambit. We would point out that, as of 1981, AM broadcast stations garnered at least 75% of all radio listenership, and that cable television as we know it today was just coming into being (for example, Cable News Network commenced operations in June, 1980).

6. During the 1980s, the Commission caused a marked increase in the number of FM stations through its implementation of Docket 80-90, and also increased opportunities for new AM stations through its "breaking down" of the clear channels and through its implementation of the so-called expanded band.

7. The Commission's website¹ reports that, as of December, 2007, there are now 4,776 AM radio stations, 6,309 FM commercial radio stations (an whopping increase of 79.4%), and 2,892 FM educational radio stations (an even bigger increase of 146.1%), for a total of 13,977 radio stations—48.1% more stations by the end of 2008 than we had at the time of deregulation in 1977. Furthermore, according to the search facility on the Commission's website, we have found that there are 66 AM original construction permit

¹<http://www.fcc.gov/mb/audio/totals/bt071231.html> (the Commission reports that as of April 25, 2008, it had not released new totals for the first quarter of 2008).

applications "accepted for filing" and awaiting grant, and 378 commercial and non-commercial FM original construction permit applications "accepted for filing" and awaiting grant.

8. Due to new technologies which were not available in 1981, the "scarcity" argument has been further weakened. XM Satellite Radio commenced operations on September 25, 2001, and Sirius Satellite Radio commenced operations on July 1, 2002². XM reported that, as of the end of 2007, it had slightly more than 9,000,000 subscribers; and Sirius reported that, at the same time, it had approximately 8,300,000 subscribers³.

9. More recently, the "HD Radio" technology has been employed by a growing number of radio stations, allowing one transmitter to send a number of signals to the listening public.

10. Additionally, there are at least 30,000,000 radio listeners in the United States who listen to non-broadcast radio stations streamed over the internet, according to a Wall Street Journal article published on March 21, 2006.⁴ According to that article, media giants like America Online stream some 200 channels over the internet. Furthermore,

²http://4wheeldrive.about.com/od/autoparts4x4accessories/a/satelliteradio_5.htm

³<http://www.tgdaily.com/content/view/36251/122/>

anybody who wants to do so can set up an internet radio station without government approval⁵.

11. Therefore, it seems silly to impose reregulation of the broadcast industry, with all the attendant paperwork, regulatory oversight and threats of fines and/or license revocation should the new/old rules not be precisely adhered to. Moreover, in view of the current economic downturn, it is absolutely imprudent to impose a costly regulatory regime on a portion of the audio broadcast industry, when the almost all of the emerging technologies that threaten the legacy technologies won't be subject to this regime.

Reregulation Equals Retaliation

12. There seems to be a sentiment on Capitol Hill to reregulate terrestrial broadcast stations in retaliation for consolidation of ownership of the mass media and also for the effectiveness of nationally syndicated conservative talk radio programs; for example, Rep. Anna Eshoo, D-California, recently introduced legislation, H.R. 4882, which would reduce broadcast license terms from eight years to three years and which would impose other onerous obligations upon broadcasters.

⁴*Internet Radio Stations Disagree Over How to Count Listeners*,
http://online.wsj.com/public/article_print/SB114184764257692831-hxJvqX1CdHgnEYLpqxJjyPoiL8A_20070321.html

⁵<http://cowboyfrank.net/real/RadioStation.htm>

13. The terms and nature of broadcast licenses are the province of Congress, but that does not mean that the Commission should act in the absence of a Congressional mandate. The Commission is still bound by 47 U.S.C. §326, which states:

Nothing in this chapter shall be understood or construed to give the Commission the power of censorship over the radio communications or signals transmitted by any radio station, and no regulation or condition shall be promulgated or fixed by the Commission which shall interfere with the right of free speech by means of radio communication.

14. Joint Commenters perceive that the Commission is under pressure from certain key members of Congress and special interest groups to reregulate the broadcast industry in order to retaliate against their political enemies. Joint Commenters would be severely harmed should the Commission succumb to this pressure and reenact regulatory measures which received the last rites 27 years ago. Joint Commenters remind the Commission that it is statutorily forbidden from enacting regulations which would interfere with the right of free speech by means of radio communication.

Ascertainment of Community Needs

15. Counsel for Joint Commenters has continuously worked in communications law since September, 1977 when he was a second year law student at The George Washington University in Washington, DC and employed by veteran

Washington communications attorneys Alfred C. Cordon, John B. Jacob and Harry G. Sells as a law clerk. He vividly remembers compiling the results of ascertainment projects for both renewal applications and for new construction permit applications. In 31 years of working with the broadcast industry, this was the single largest "make work" project that the Commission imposed on broadcasters, with very little public interest benefit. The Commission's case law that evolved prior to 1981 was rife with situations where community ascertainment turned into games of "gotcha", where opponents would flyspeck the other applicant's ascertainment study and look for insufficient community leader interviews, or interviews that may or may not have taken place.

16. In addition to the community leader surveys, applicants also had to provide a "general public survey", which typically involved hiring a college professor who lived in the state of Iowa, who then had a phone bank make telephone calls to residences in the area where the station was located. The only real beneficiary of these studies was the college professor who was paid to conduct them.

17. In requiring these studies, the Commission overlooked the simple fact that broadcasters owe their ability to stay in business upon serving the listening public. Even religiously oriented radio stations have had

to be sold or have otherwise ceased operations where they did not have listeners, and did not have a revenue or donation stream sufficient to allow the station to continue operations. In commercial broadcasting, the owners of stations routinely fine tune or change formats to provide something of interest to the listening public, in order to stay in business. Broadcast station owners simply have to know what is going on in their local communities. To force broadcasters to engage in a Washington-dictated, top down, formulaic "make work" ascertainment effort is to demand a waste by a broadcast licensee of scarce resources that could be more wisely used in some other aspect of the broadcasters' obligation. Joint Commenters respectfully request that the Commission refrain from reimplementing any type of formal ascertainment requirements.

Community Advisory Groups

18. Joint Commenters oppose federal government mandated "community advisory groups". Joint Commenters operate broadcast stations which teach and espouse the two millennia old Roman Catholic faith, a faith which is not subject to referenda or committee decisions. Joint Commenters are particularly concerned that the federal government might require them to admit persons to such groups who are opposed to the Roman Catholic religion. Then, if the "community advisory group" is at loggerheads

with the licensee over what programming should air on a station, will the Commission become the arbiter? Will the Commission be called upon to choose sides, between the community advisory group and the broadcaster? If the Commission sides with the community advisory group, what sanctions will be imposed against the broadcaster? The whole concept of a federally-mandated "community advisory group" is at odds with the current regulatory scheme, where the broadcaster has the final say and absolute veto power over what does and does not go out over its air.

19. Some Joint Commenters have a voluntary advisory council. However, the role of such a council is purely advisory—the licensee accepts or rejects any advice received, with no legal or regulatory repercussions. The licensee has the final say over all programming and business decisions. Joint Commenters urge that the Commission keep the current regulatory regime in place, and resist the urge to make any provisions in its rules for "community advisory groups" such as expedited treatment for renewal applications for stations that employ them.

20. One last point in this area. We would remind the Commission that, in the area of equal employment opportunity, the federal government cannot force religious broadcast stations to employ persons who do not share the religious faith of the licensee. 47 CFR §73.2080(c)(1);

Report and Order in MM Docket No. 98-204, 15 FCC Rcd 2329, ¶149 (2000)⁶; *Lutheran Church-Missouri Synod v. FCC*, 141 F.3d 344 (D. C. Cir. 1998).

21. It therefore follows that, if the federal government cannot force a religious broadcaster to employ a person that does not hold the same religious beliefs, then it can't force a broadcaster to broadcast programs or materials that violate its religious beliefs. Therefore, on the basis of the "free exercise" clause of Amendment 1 to the federal Constitution, the Commission cannot force a religious broadcaster to maintain a "community advisory group" that has members who do not share the licensee's religious beliefs.

Minimum Amounts of News and Non-Entertainment Programs

22. Given the plethora of media sources that exist in 2008 that did not exist back in 1981, it seems silly to re-enact rules mandating minimum amounts of news, public affairs and other non-entertainment programs on broadcast stations.

23. In the case of Joint Commenters' stations, this would not be an issue, as most of the programming aired on these stations could be logged as news, public affairs or

⁶ Paragraph 149 states in pertinent part: Religious broadcasters may establish religious belief or affiliation as a qualification for all radio station employees.^[FN228] Religious broadcasters who establish religious affiliation as a qualification for a job position will not be required to comply with the FCC's specific recruitment requirements for that position.^[FN229]

other non-entertainment programs (using the definitions of such programs that prevailed prior to 1981). However, once this door is reopened, the Commission could get involved with regulating the types of news, public affairs and other non-entertainment programs that would "count" toward a broadcaster's obligation. For example, it could rule that only news and public affairs programs that were produced in the city of license would be counted. Those interests who are in power at the FCC that are opposed, for example, to Roman Catholicism could use their regulatory power to persecute Roman Catholic broadcasters.

24. The undersigned wishes to remind the current Commissioners of the seminal case which led the Commission to abandon minimum percentages of news, public affairs and other non-entertainment programs as a *sine qua non* of license renewal. A Cleveland, Ohio FM radio station that broadcast "beautiful music", WQAL, essentially refused to broadcast news, public affairs and other non-entertainment programs, except during the period 4:30 to 6:00 a.m. on Saturdays and Sundays. WQAL argued to the Commission that it having to broadcast news, public affairs and non-entertainment programs was burdensome and essentially ridiculous, as at the time the Cleveland market had radio stations that devoted most of their program time to such

Rather, they will be expected to make reasonable good faith efforts to recruit widely among their

programs. Therefore, listeners who desired such programming were served by those other stations; and listeners who desired a continuous background music service were served by WQAL.

25. The Commission designated the WQAL 1976 renewal of license application for hearing. *SJR Communications, Inc.*, 67 FCC 2d 1103 (1978). However, it was the sound and logical position taken by the licensee of WQAL which led the Commission in 1981 to change its rules and abandon the requirement of minimum percentages of non-entertainment programs.

26. In the year 2008, there is no need for any one broadcast station to be a "full service station". The consumer of electronic media has an overwhelming choice of content providers and means of reception. If someone would like a newscast, over-the-air radio newscasts compete with the cable news providers like CNN, Fox News Channel, CNBC and MSNBC, and the news offerings on web portals like yahoo.com, as well as the thousands of specialty web sites on the internet. Indeed, it serves the public interest for broadcast stations to meet niches in their respective markets, to serve otherwise unmet needs, which they in their best good faith discretion determine.

27. Broadcast radio stations cannot be viewed in a vacuum. Rather, they must be considered as a part of the overall media available to the consumer of content. This will be even more true as wireless internet providers develop more and more reliable services that can be received in automobiles, and permit the motorist to choose between terrestrial broadcast stations, DARS satellite-delivered streams (Sirius and XM) and internet-delivered broadcasts. Viewed this way, it simply makes no sense to reregulate the industry—it is sort of like forcing over the road 18 wheel truckers to carry buggy whips in their cabs.

Main Studio Requirements

28. It is the experience of Joint Commenters that members of the general public rarely visit the studios of broadcast stations. Likewise, the only parties who ever seem to review a station's public file is an FCC inspector or a party that has a grudge against a station and desires to file a petition against the station at renewal time.

29. Further, the Commission has granted non-commercial religious broadcasters that have a number of stations "satellite" status, enabling these broadcasters to maintain just one studio and office location, thereby conserving scarce resources.

30. Joint Commenters urge the Commission to refrain from reregulating the broadcast industry as to the main studio rule, Section 73.1125 of the Rules.

Staffing Requirements

31. Here is another area where reregulation of the industry makes no sense, except to serve those political interests who wish to retaliate against the industry to redress some perceived wrong.

32. Remote control equipment and EAS test equipment is so good and so reliable that late night and overnight staffing of radio stations is simply not required. Furthermore, radio automation equipment, which has been used in some form since the late 1960s, has become so reliable that the actual quality of the on-air program in many cases in smaller markets is superior to a manned studio operation.

33. The Commission's Review Board went on record in 1974 as reversing an Administrative Law Judge on a staffing issue and ruling that a husband and wife "mom and pop" staffing proposal for a new FM broadcast station at Bisbee, Arizona met minimum FCC requirements. ***Bisbee Broadcasters, Inc.***, 48 FCC 2d 291 (Rev. Bd. 1974). Therefore, even during the last seven years of the original "regulation" period, the Commission permitted and tolerated "mom and pop" staffing. Now, the Commission is proposing rules that would frustrate "mom and pop" radio station staffing, thereby

hurting local broadcast operations in small cities, where many of these stations exist.

34. Joint Commenters urge the Commission to keep its hands off small market broadcasting and non-commercial broadcasting, which frequently needs to resort to small paid staffs and volunteers to stay on the air.

"AM Programming on FM Translators"

35. Joint Commenters do support the Commission's initiative to permit FM Translator stations to rebroadcast AM station programming. This will help daytime only AM stations to be able to serve the public 24 hours per day.

Conclusion

36. There is plenty of localism inherent in the American terrestrial broadcasting system. There are almost 14,000 terrestrial radio broadcast stations on the air in the United States and possessions. This represents a 48.1% increase in the number of stations available to the public over what was available when radio was deregulated in 1981. There are several hundred pending applications for new AM, FM and non-commercial FM stations, which the Commission could grant within the next 60 days.

37. Those parties who wish a return to a comprehensively regulated environment for terrestrial radio would bring back (1) excruciatingly detailed daily program logs for the "composite week" to accompany license renewal

applications, (2) burdensome ascertainment surveys which were and would be nothing more than expensive overkill above and beyond the broadcaster's daily awareness and instincts as to public needs, and (3) intrusive reporting requirements such as the late and unlamented Form 324 annual financial reports. Radio stations would have to employ people to work around the clock when modern technology makes their presence unneeded. The Commission would require stations to abandon their investments in studios that happen to be outside the corporate boundaries of their community of license.

38. This state of affairs would badly wound "mom and pop" broadcast operations and small non-profit organizations such as Joint Commenters. It would be an absolute boondoggle for the communications bar, and there were many members of the Federal Communications Bar Association at a meeting held on March 30 in Washington just drooling over the prospect of reregulation and the opportunity to "earn" large fees off the backs of Commission licensees.

WHEREFORE, Joint Commenters urge the Commission not to reregulate the broadcast industry, but they urge the Commission to permit FM translator stations to rebroadcast the programming of AM broadcast stations in their areas.

Respectfully submitted,

**IHR EDUCATIONAL BROADCASTING
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QUEEN OF PEACE RADIO, INC.
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DATED AND FILED: April 28, 2008

**PRIMARY STATIONS LICENSED
OR AUTHORIZED TO JOINT COMMENTERS:**

• **IHR Educational Broadcasting:**

KAHI(AM)	Auburn, California	FIN 48341
KIHM(AM)	Reno, Nevada	FIN 53707
KJOP(AM)	Lemoore, California	FIN 31589
KJPG(AM)	Frazier Park, California	FIN 2268
KPJP(FM)	Greenville, California	FIN 92527
KSMH(AM)	West Sacramento, California	FIN 87036
KWG(AM)	Stockton, California	FIN 60418
KXXQ(FM)	Milan, New Mexico	FIN 17161
KSFB(AM)	San Francisco, California	FIN 6369

IHR Educational Broadcasting is permittee of the following “full-power” broadcast station for which an application for initial covering license was dismissed (a petition for reconsideration is planned):

KCIK(AM)	Blue Lake, California	FIN 129510
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IHR Educational Broadcasting is permittee of the following “full-power” broadcast stations:

NEW AM	Bend, Oregon	FIN 160749
NEW AM	Huntley, Montana	FIN 161262
KIHH(AM)	Eureka, California	FIN 160910
NEW AM	Battle Mountain, Nevada	FIN 160756
NEW AM	Winnemucca, Nevada	FIN 160748
NEW AM	Bishop, California	FIN 160762
NEW AM	Ridgecrest, California	FIN 161213
NEW FM	Alturas, California	FIN 123304

• **Covenant Network**

WRYT(AM)	Edwardsville, Illinois	FIN 27556
WIHM(AM)	Taylorville, Illinois	FIN 42644
WOLG(FM)	Carlinville, Illinois	FIN 8882
WHOJ(FM)	Terre Haute, Indiana	FIN 76151
KBKC(FM)	Moberly, Missouri	FIN 90381
WRMS(AM)	Beardstown, Illinois	FIN 13649
KHOJ(AM)	St. Charles, Missouri	FIN 7114
WCKW(AM)	Garyville, Louisiana	FIN 115
New FM CP	Dexter, Missouri	FIN 175893

- **Queen of Peace Radio, Inc.**

WQOP(AM)	Atlantic Beach, Florida	FIN 48393
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- **La Promesa Foundation**

KLPF(AM)	Midland, Texas	FIN 17235
KVDG(FM)	Midland, Texas	FIN 91761
KWMF(AM)	Pleasanton, Texas	FIN 55415
KJMA(FM)	Floresville, Texas	FIN 72878
KBKN(FM)	Lamesa, Texas	FIN 84914
KBMD(FM)	Marble Falls, Texas	FIN 86792
New FM CP	Morton, Texas	FIN 171699

- **Sacred Heart Radio, Inc. (Washington)**

KBLE(AM)	Seattle, Washington	FIN 33667
KTTO(AM)	Spokane, Washington	FIN 38492
New AM CP	Waterville, Washington	FIN 160777

- **Sacred Heart Radio, Inc. (Ohio)**

WNOP(AM)	Newport, Kentucky	FIN 15881
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- **Catholic Radio Network, Inc.**

KEXS(AM)	Excelsior Springs, Missouri	FIN 14620
KAHS(AM)	El Dorado, Kansas	FIN 48538
KFEL(AM)	Pueblo, Colorado	FIN 23161

- **Chatham Hill Foundation**

KATH(AM)	Frisco, Texas	FIN 52342
KJON(AM)	Carrollton, Texas	FIN 2190

- **Real Presence Radio**

KWTL(AM)	Grand Forks, North Dakota	FIN 69201
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- **Mediatrix SC, Inc.**

WCKI(AM)	Greer, South Carolina	FIN 60503
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- **Radio Properties, LLC**

WQIZ(AM) St. George, South Carolina FIN 38899

- **Baraga Broadcasting, Inc.**

WTCK(FM) Charlevoix, Michigan FIN 121256

- **Spirit Educational Association, Inc.**

WSOG(FM) Spring Valley, Illinois FIN 91823

- **Divine Mercy Communications, Inc.**

WDMC(AM) Melbourne, Florida FIN 68615

- **Cause Plus Marketing, LLC**

WWOW(AM) Conneaut, Ohio FIN 13724

- **Catholic Radio of the Texas High Plains**

KDJW(AM) Amarillo, Texas FIN 48509

- **Putbrese Communications, Ltd.**

KWKY(AM) Des Moines, Iowa FIN 49099

- **St. Gabriel Radio, Inc.**

WUCO(AM) Marysville, Ohio FIN 29636

- **Redwood Family Services, Inc.**

KHOT(AM) Madera, California FIN 39566

- **El Sembrador Ministries**

Applicant for Assignment of License of KHPY(AM), Moreno Valley, CA FIN 87156

- **Franciscan University of Steubenville**

Singleton Applicant for a new NCE FM Station at Hopedale Ohio FIN 171722