

CHRISTIAN BROADCASTING SYSTEM, LTD.
P.O. Box 808
Fenton, MI 48430

June 15, 2009

Submitted Via Electronic Comment Filing System

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WT Docket Nos. 08-61 and 03-187

Dear Ms. Dortch:

These comments are submitted in opposition to the *Petition for Expedited Rulemaking and Other Relief* filed on behalf of American Bird Conservancy, Defenders of Wildlife and National Audubon Society, April 14, 2009, seeking the Commission's quick adoption of rules regarding several environmental issues, including rules toward reducing deaths of migratory birds.

I am President of Christian Broadcasting System, Ltd., licensee of eight full-power radio broadcasting stations and owner of more than a dozen registered communications towers. I have been in the broadcasting business for more than 25 years. In all of my experience, the only birds I have ever seen in relation to communications towers are those that have briefly perched on the towers to rest. I have never encountered a dead bird at a tower site, nor has a bird death resulting from a strike to one of our towers ever been reported to me or any of my employees.

My experience indicates that it is unlikely that millions of bird deaths are caused by communications towers. I therefore urge the Commission to refrain from creating additional regulatory burdens on broadcasters and other tower owners in a quixotic attempt to combat an unsubstantiated problem.

Respectfully submitted,

Christian Broadcasting System, Ltd.

_____/s/_____
Jonathon R. Yinger
President