



December 21, 2009

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: MB Docket No. 07-294, Request for Relief

Dear Ms. Dortch:

Simmons Media Group, LLC ("Simmons") has reviewed a letter dated December 18, 2009, from certain law firms representing broadcasters and broadcaster associations reporting a meeting with FCC staff concerning the new FCC Form 323.

Simmons is a small, mostly family owned company that operates just two dozen radio stations, most in smaller markets. After attempting with little success to prepare the necessary FCC ownership reports ourselves in recent days, we can confirm the inordinate amount of time, technical difficulties, and other experiences with the new ownership report filing requirements that were reported in the December 18th letter.

We also call attention to a change to prior versions of the Form 323 that cause further unnecessary burdens on licensees. Specifically, licensees are no longer permitted to include multiple licensees in response to Question 7. As a result, Simmons faces the prospect of filing the same reports multiple times, with each filing requiring up to several hours of time. Given the historic financial pressures on radio broadcasters and small businesses like ours, Simmons simply cannot afford to hire several full-time temporary staffers simply to prepare, proof, and submit all the ownership reports now required. These enormous costs do not seem justified since the duplicative reports will not provide the FCC and the public with any additional substantive information.

For these reasons, we respectfully request that the FCC grant the relief requested by broadcast counsel in their December 18th letter, and, in addition, modify the form to allow parties to identify multiple licensees (through sub-forms) in response to Question 7.

Respectfully,

A handwritten signature in black ink, appearing to read "Bret J. Leifson".

Bret J. Leifson
VP Admin./Controller

cc: Recipients of Broadcast Counsel's December 18th Letter