

AU Docket No. 10-31

JEM Broadcasting Co. Inc.

CP No. MM-FM 744-268A

BPH-19970912MT

Facility ID No. 88358

JEM Broadcasting Company, Incorporated, applicant BPH-19970912MT for Greenwood, Arkansas in Auction 88 hereby submits the following comments.

The application to be auctioned for Greenwood, Arkansas was filed almost thirteen years ago. During that time the industry has gone through a massive consolidation. This has made the ability of a single owner operator more difficult to not only survive, but to enter the competition. Competing with multiple station owners not only within the market but owners with facilities in multiple markets makes the entry as a single station owner operator more difficult.

In the current economic environment this is compounded by the reluctance of banks to make loans for new start up facilities. To the broadcaster with multiple facilities this is not as much of a problem because lenders can judge the applicant based on other similar facilities.

JEM Broadcasting Company Incorporated is a single applicant with no other broadcast facilities. JEM Broadcasting Company is an applicant in only one

auction to be held as part of Auction 88.

To allow a diverse pool of applicants we suggest a bidding credit for applicants with no other broadcast facilities. This has been done in past auctions. JEM Broadcasting Company also suggests allowing applicants with no other broadcast facilities to defer payment of the balance of the bid until the license application is submitted.

These comments have been prepared and submitted by Elvis L. Moody, President, JEM Broadcasting Company, Incorporated.