

THE AMHERST ALLIANCE AND NEXUS

May 21, 2012

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The undersigned parties go farther. We advise the Commission to avoid modifying its proposal for consortia bonus points. Instead, we urge the Commission to eliminate its consortia proposal completely.

We are deeply concerned that unethical LPFM applicants could manufacture "paper partners" in order to gain a dramatic advantage over their rivals. Then the "paper partners" would either leave the scene "officially" or "rubber stamp" whatever the real station operator wants to do.

We have not been able to conceive of any "modifications" which could eliminate this risk of fraudulent consortia applications. So far as we can tell, the risk of fraud appears to be inherent in the Commission's consortia proposal. Therefore, we hope that the consortia proposal will be withdrawn.

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Respectfully submitted,

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