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I write to urge an exemption for Non-Commercial -Educational (NCE) or smaller NCE radio stations regarding the electronic public file requirement.

I am concerned that requiring small NCE radio stations to file an electronic public file would...

1. Be an onerous duty for small college stations like the one I work for, and,
2. Greatly facilitate frivolous complaints by individuals with a grudge against the station.

Regarding #1, the small college station I work for (WRTC, Trinity College, Hartford - provided for identification and illustration purposes only), only recently received budgetary funds allowing the hiring of a General Manager. For decades, the Chief Engineer was the only employee, and only hired for 7 hours per week! College students, who nominally ran the station, are notoriously unreliable.

Also, since many public file items are paper, this requires having the technical facilities and personnel to scan, as well as upload, the items.

Regarding #2, since WRTC (as an illustration) allows approximately 70 non-student folks from the larger Hartford (inner city) community air shifts, we (unfortunately) have, with some frequency, need to discipline - or even ban - individuals for rule violations or other behavioral issues. As our staff often have an (unfounded) sense of entitlement (not to mention "authority issues"), we thus generate a cadre of potentially disgruntled people who might hold a grudge against the station. Such people might use the trivially easy, anonymous, and electronic access to comb the public file for violations simply in order to make trouble for the station.

So I hope the FCC will decide to exempt at least all NCE - or smaller NCE - stations from the requirement to post their public files to the web.

Thank you for your consideration.

John Schwenk
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