

August 29, 2016

The Honorable Tom Wheeler
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554



Re: Review of the Commission's Broadcast Ownership Rules
MB Docket No. 14-50

Dear Chairman Wheeler:

Thank you for the courage you have shown in your decision limiting further consolidation of the broadcast industry. You have done the right thing in preserving the existing restrictions on multiple ownership of broadcast radio facilities.

I operate a family-owned independent radio station KKGQ (FM) in Los Angeles, California. I placed it on the air in 1959, and still work every day as General Manager. My son and my daughter joined me in the station's operation. We also operate KMZT (AM) in the Los Angeles market.

Prior to the Telecommunications Act in 1996, local radio was a creative and community-oriented service. Competing with many other operators, each with no more than an AM/FM combo, fostered a vibrant creative process. The public benefited from the competition, and young people could apply for jobs in broadcasting.

Now, two decades after the Telecommunications Act of 1996, what is the state of local radio? Has there been a benefit to the public? Definitely not in my opinion. Tens of thousands of radio station employees have been fired, while programming has become dull and of limited local public appeal. There are few locally-owned, family operated, stations in the market competing against goliaths.

Young people rarely apply for a position with a local station because there are hardly any jobs. Competing in the advertising market place is so much more difficult. Due to consolidation, radio advertising is now sold in clusters. Buy the eight station cluster and there are special deals, bonuses, and discounts. This is anti-competitive in my opinion. To make matters worse, these groups actually wanted to compound this untenable environment by increasing the caps in Los Angeles to twelve stations.

Radio as a competitive, creative medium is worse off today. The broadcast industry would face extinction as a local service to allow additional consolidation. What the radio industry really needs is to roll back ownership caps. That would open competition to multiple operators, increase viewpoint diversity, boost local employment, and inspire creative solutions to stand out among the competition. Because of my passion for radio and serving the public, I have operated

niche formats (Jazz, Classical, and, yes, Country in L.A.) because there was a need in the community for these formats despite limited revenue. The industry would be well served by more owners with a passion for radio and public service.

Very truly yours,

Mount Wilson FM Broadcasters, Inc.

Saul Levine
President

cc: Hon. Mignon Clyburn, FCC Commissioner
Hon. Michael O'Rielly, FCC Commissioner
Hon. Agit Pai, FCC Commissioner
Hon. Jessica Rosenworcel, FCC Commissioner