

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

	)	
In the Matter of:	)	
	)	
Petition for Rulemaking	)	File No. RM-11388
of the Minority Media and	)	
Telecommunications Council	)	
	)	
To Facilitate the Entry of Small Businesses	)	
Into Local Radio Markets	)	
	)	

**REPLY COMMENTS OF 48 PARTIES**

The undersigned 48 parties, including 21 radio broadcast companies, five financial institutions and capital providers, 16 media brokerages and six public interest and civil rights organizations, support the Petition for Rulemaking of the Minority Media and Telecommunications Council (“MMTC”). MMTC asks the Commission to modify its existing policy regarding radio cluster ownership to allow a grandfathered cluster that otherwise exceeds the applicable ownership cap to be transferred in its entirety to any third party as long as the third party transfers the stations exceeding the cap within 12 months to a small business.<sup>1</sup> We support this important proposal, which would create critical opportunities for minorities and women in broadcast ownership.

The commenters in this proceeding encouraged the Commission to follow MMTC’s proposal to adjust its ownership policies to give effect to its 2003 effort to promote

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<sup>1</sup> Minority Media and Telecommunications Council, *Petition for Rulemaking To Facilitate the Entry of Small Businesses Into Local Radio Markets*, File No. RM-11388, at 2 (filed July 12, 2007) (“Petition”).

small business entry into the broadcast industry.<sup>2</sup> In its comments, the National Association of Broadcasters expressed support for MMTC's proposal and encouraged MMTC and the Commission to address the practical issues associated with implementation.

We agree with the commenters that MMTC's proposal is an important one, and we believe that NAB's practical questions can be readily addressed. Accordingly, we urge the Commission to issue a Notice of Proposed Rulemaking promptly and to expeditiously adopt MMTC's proposal.

Respectfully submitted,

/s/

Alta Communications, Inc.  
by: Robert Emmert, Vice President  
John Hancock Building  
200 Clarendon Street  
51st Floor  
Boston, MA 02116

/s/

Bonneville International Corporation  
by: Bruce T. Reese, President and CEO  
55 North 300 West  
Suite 800  
Salt Lake City, UT 84180-1109

/s/

Frank Boyle & Co., LLC  
by: Frank Boyle, President  
2001 W. Main Street  
Suite 280  
Stamford, CT 06902-4501

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<sup>2</sup> Comments of Clear Channel Communications, Inc., RM-11388 (filed Sep. 5, 2007); Comments of the Nat'l Ass'n of Broadcasters, RM-11388 (filed Sep. 5, 2007); Comments of the Minority Media and Telecommunications Council, RM-11388 (filed Sep. 5, 2007).

/s/

Broomfield Broadcasting, Inc.  
by: John Broomfield, President  
210 Montague Avenue  
Greenwood, SC 29648

/s/

Bustos Media, LLC  
by: Amador S. Bustos, President and CEO  
500 Media Place  
Sacramento, CA 95815

/s/

CBS Radio Inc.  
by: Steven A. Lerman, General Counsel  
Leventhal Senter & Lerman PLLC  
2000 K Street N.W.  
Suite 600  
Washington, D.C. 20006-1809

/s/

Citadel Broadcasting Corporation  
by: Nancy A. Ory  
Leventhal Senter & Lerman PLLC  
2000 K Street N.W.  
Suite 600  
Washington, D.C. 20006-1809

/s/

Clear Channel Communications, Inc.  
by: Andrew W. Levin, Executive Vice President,  
Chief Legal Officer, and Secretary  
200 East Basse Road  
San Antonio, TX 75201

/s/

CMS Station Brokerage, Inc.  
by: Roger Rafson, President  
1831 Murray Avenue  
Suite 216  
Pittsburgh, PA 15217

/s/

CobbCorp, LLC  
by: Brian E. Cobb, President  
Eight Hundred Laurel Oak Blvd.  
Suite 210  
Naples, FL 34108

/s/

Dover Capital Partners, LLC  
by: Peter H. Ottmar, General Partner  
1110 Central Avenue  
Pawtucket, RI 02861

/s/

Emmis Communications Corporation  
by: John E. Fiorini III  
Wiley Rein LLP  
1776 K Street N.W.  
Washington, D.C. 20006

/s/

Entercom Communications Corp.  
by: John C. Donlevie, Executive Vice President  
and General Counsel  
401 City Avenue  
Suite 809  
Bala Cynwyd, PA 19004

/s/

Envest Media, LLC  
by: Mitt Younts, Managing Member  
6802 Patterson Ave.  
Richmond, VA 23226

/s/

The Exline Company  
by: Andrew McClure, President  
4340 Redwood Highway  
Suite F-230  
San Rafael, CA 94902-2104

/s/

First Broadcasting Operating, Inc.  
by: Hal A. Rose, Executive Vice President  
8300 Douglas Avenue  
Suite 730  
Dallas, TX 75225

/s/

Richard A. Foreman Associates, Inc.  
by: Richard A. Foreman, President  
333 Emery Drive East  
Stamford, CT 06902-2210

/s/

Galaxy Communications, LP  
by: Sally A. Buckman  
Leventhal Senter & Lerman PLLC  
2000 K Street N.W.  
Suite 600  
Washington, D.C. 20006-1809

/s/

Dave Garland Media Brokerage  
by: Dave Garland, President  
2035 Telephone Road  
Houston, TX 77023

/s/

Gladstone Capital  
by: David Meier, Managing Director  
200 S. Wacker Dr.  
31<sup>st</sup> Floor  
Chicago, IL 60606

/s/

Greater Media  
by: Sally A. Buckman  
Leventhal Senter & Lerman PLLC  
2000 K Street N.W.  
Suite 600  
Washington, D.C. 20006-1809

/s/

Henson Media, Inc.  
by: Ed Henson, President  
455 South Fourth Avenue  
Suite 427  
Louisville, KY 40202-2508

/s/

Independent Spanish Broadcasters Association  
by: Ronald J. Gordon, President  
c/o ZGS Broadcast Holdings Inc.  
2000 N. 14<sup>th</sup> Street  
Suite 400  
Arlington, VA 22201

/s/

Kalil & Co., Inc.  
by: Frank Kalil, President  
3444 North Country Club  
Suite 200  
Tucson, AZ 85716

/s/

Kozacko Media Services  
by: Richard L. Kozacko, President  
800 Underwood Avenue  
Elmira, NY 14902

/s/

League of United Latin American Citizens  
by: Eduardo Peña, Communications Counsel  
Peña & Associates  
1730 Rhode Island Ave. N.W.  
Suite 505  
Washington, D.C. 20036

/s/

Legend Communications LLC  
by: Larry Patrick, President  
6805 Douglas Legum Drive  
Suite 100  
Elkridge, MD 21075

/s/

Marconi Media Ventures, Inc.  
by: Chuck Lontine, Managing Director  
4582 South Ulster Street  
Suite 1600  
Denver, CO 80237-2578

/s/

Media Services Group, Inc.  
by: George R. Reed, Managing Director  
3948 South Third Street  
Suite 191  
Jacksonville Beach, FL 32250

/s/

Media Venture Partners, LLC  
by: Elliot B. Evers, Managing Director  
244 Jackson Street  
Fourth Floor  
San Francisco, CA 94111

*David Honig*

Minority Media and Telecommunications Council  
by: David Honig, Executive Director  
3636 16<sup>th</sup> Street N.W.  
Suite B-366  
Washington, D.C. 200010  
(202) 332-7005  
dhonig@crosslink.net

/s/

Multicultural Radio Broadcasting, Inc.  
by: Arthur Liu, President and CEO  
449 Broadway  
New York, NY 10013

/s/

MyMediaBroker.com  
by: Sandi Bergman, President  
407 Broadmoor  
Portales, NM 88130

/s/

National Council of Churches USA,  
Communication Commission  
by: Wesley M. Pattillo  
Executive Director of the Communication  
Commission and Associate General Secretary  
of the National Council of Churches USA  
475 Riverside Drive  
Suite 880  
New York, NY 10115

/s/

National Hispanic Media Coalition  
by: Inez Gonzalez, Director of Media Policy  
1201 W. 5<sup>th</sup> Street  
Suite T-205  
Los Angeles, CA 90017

/s/

Norsan Broadcasting System  
by: Norberto Sanchez, Chairman and CEO  
P.O. Box 957058  
Duluth, GA 30095

/s/

Pacific Media Capital, LLC  
by: James K. Downey, Manager  
100 Wilshire Boulevard  
Suite 1280  
Santa Monica, CA 90401



/s/

Pappas Telecasting Companies/TuVision LLC  
by: Peter C. Pappas, Executive Vice President  
Washington Corporate Office  
1776 I Street N.W.  
Suite 900  
Washington, D.C. 20006

/s/

Patrick Communications  
by: Susan Patrick, Managing Partner  
6805 Douglas Legum Drive  
Suite 100  
Elkridge, MD 21075

/s/

Prometheus Radio Project  
by: Pete Tridish, Director of Electromagnetism  
P.O. Box 42158  
Philadelphia, PA 19101

/s/

Qantum Communications LLC  
by: Frank Osborn, CEO  
3 Stamford Landing  
Suite 210  
Stamford, CT 06902-7225

/s/

Radio One, Inc.  
by: Linda J. Vilaro  
Chief Administrative Officer  
5900 Princess Garden Parkway  
7<sup>th</sup> floor  
Lanham, MD 20706

/s/

Spanish Broadcasting System, Inc.  
by: Melanie Montenegro, General Counsel  
2601 S. Bayshore Drive  
PH 2  
Coconut Grove, FL 33133

/s/

TAG Media Consulting LLC  
by: Terry A. Greenwood, Managing Member  
8520 Woodfall Road  
Nottingham, MD 21236

/s/

URBan Radio Broadcasting LLC  
by: Kevin Wagner, President and CEO  
273 Azalea Road  
Suite 1-308  
Mobile, AL 36609

/s/

Wells Fargo Foothill  
by: John R. Brooks, Managing Director,  
Media Originations  
601 California Street  
Suite 704  
San Francisco, CA 94018

/s/

Willis Broadcasting Corporation  
by: John C. Trent  
Putbrese Hunsaker & Trent, P.C.  
2000 South Church Street  
Woodstock, VA 22664

/s/

ZGS Broadcast Holdings Inc.  
by: Ronald J. Gordon, President and CEO  
2000 N. 14<sup>th</sup> Street  
Suite 400  
Arlington, VA 22201

October 5, 2007