

KyMBERleigh Richards
16003 Gault St., Apt. 7
Van Nuys, CA 91406-4937
818.781.0487
kymber@pacbell.net

Received & Inspected

MAY 30 2013

FCC Mail Room

May 28, 2013

Federal Communications Commission
Attn: Mass Media Bureau
445 W. 12th St.
Washington DC 20554

In re: Form 314 Applications for Assignment of the licenses for Radio Stations KDAY(FM) Redondo Beach, Calif. (Facility ID 10100) and KDEY-FM Ontario, California (Facility ID 10099), File Numbers BALH-20130408ACM and BALH-2013408ACL

To Whom It May Concern:

I write in opposition to the proposed assignment of the above referenced licenses to RBC Communications, Inc., a/k/a RBC License LLC, on the basis that the proposed assignee does not meet the legal and moral qualifications to hold a broadcast license.

RBC Communications, Inc. is controlled by RBC Investments LLC, as shown in Exhibit 14 of the Form 314 filing. RBC Investments LLC is 100% owned by Anthony Yuen, a naturalized citizen of the United States who is employed by the Chinese media company Phoenix Television as its editor-in-chief and current affairs anchor. Phoenix Television, through its subsidiary Phoenix Satellite Television (U.S.) Ltd., owns 20% of RBC License LLC. Despite the percentage of ownership being limited to comply with Section 310(b) of the Communications Act of 1934, the fact that they are Yuen's employers implies *de facto* control of RBC License LLC and the limitation is a pure fiction designed to comply with the Act on paper only.

Yuen has failed to identify this interlocking relationship with Phoenix Television in the application and its exhibits. Further, the other two officers of RBC Communications, Inc. – Xiao Yong Wu a/k/a Wu Xiaoyong (a citizen of the People’s Republic of China) and Ka Keung Yeung (a citizen of the United Kingdom) – are the CEO and CFO of Phoenix Satellite Television (U.S.) Ltd., respectively. This is also not disclosed in the application and its exhibits. Further, Wu Xiaoyong, who is RBC’s signatory to the asset purchase agreement document provided as an exhibit in the Form 314 filing, is the son of China’s former Vice Premier Wu Xiequan.

Phoenix Television can therefore be described as the true parent company of RBC License LLC. It is strongly aligned with the Chinese Communist Party and its Hong Kong operations are essentially controlled by the Communist Party government in China. Phoenix itself is only nominally privately-owned; its main investor is the State-owned enterprise China Mobile. Further, it is headed by Liu Changle, a well-connected former colonel in the People’s Liberation Army who once served as a military affairs correspondent for China National Radio.

Dr. Anne-Marie Brady of the University of Canterbury in New Zealand, regarded as an expert on the Chinese Communist Party and its hold on power, testified on April 30, 2009 at a hearing by the U.S.-China Economic Security & Review Commission. In her testimony, she described Phoenix Television as “more loyal than CCTV (Chinese Communist Television)” to the party and closely tied to the Party’s “foreign propaganda agenda”. Dr. Brady said that Phoenix uses a “loyal opposition” stance to appear independent of the Party but with an impression of “objectivity” to build a false positive impression of the Party and of mainland China itself.

In 2004, James Borton, an author on the subject of China’s media, described Phoenix Television as “a stellar example of how the Chinese Communist Party undertakes a delicate balancing act between market forces and control of the media.”

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When Phoenix Television created the subsidiary company Phoenix North American Chinese Channel (PNACC) in 2001, a sufficient number of questions arose regarding its possible role in China's espionage efforts in the U.S. to cause the FBI to describe it as a possible "front" company for these purposes. On October 28, 2005, two Chinese couples were arrested in the Los Angeles area by U.S. intelligence officials and charged with stealing U.S. military secrets. One man arrested at Los Angeles International Airport, Tai Wang Mak, was identified as a broadcast and engineering director for PNACC.

It appears, then, that disclosures germane to the question of the fitness of RBC License LLC have been withheld and that the exhibits to the Form 314 filing were made deliberately vague to conceal material facts that relate to the actual ownership and loyalties of the proposed assignee. Specifically, the apparent control by Phoenix Television has been hidden from the Commission in the documentation it was provided.

Given the various interlocking relationships that exist between the proposed assignee and the Chinese government, I believe a full investigation of RBC Communications, Inc. and its principals must be conducted by the Commission to determine if they indeed meet the requirements to be the holder of broadcast licenses in this country. Further, I strongly suggest that the omission of these relationships in the exhibits to the Form 314 filing is, in and of itself, indicative of the lack of moral and ethical character required of a licensee. In short, there has been a near-complete lack of candor on the part of the proposed assignee in their filings with the Commission.

I urge the Commission to delay processing of the applications until such a investigation has been conducted, to ensure that the best interests of the public are met.

Respectfully submitted for your consideration,