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Federal Communications Commission  
Office of the Secretary

2012 NOV -6 A 6:05

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of	)	
	)	
<b>TOCCOA FALLS COLLEGE</b>	)	Facility I.D. No. 77327
	)	NAL/Acct. No. MB201241410025
Noncommercial Educational Radio Station	)	FRN: 0006338750
WTXR(FM)	)	[Related Case: BRED-20111201FOP]
Toccoa Falls, Georgia	)	

To: Office of the Secretary  
Attention: Chief, Audio Division  
Media Bureau

**SUPPLEMENT TO PETITION FOR RECONSIDERATION**

Toccoa Falls College (“the College”) licensee of WTXR(FM), Toccoa Falls, Georgia, by its counsel, respectfully files this Supplement to the College’s Petition for Reconsideration filed August 27, 2012, directed to the Media Bureau’s (“MB”) *Forfeiture Order*, 27 FCC Rcd 8365 (2012) that imposed a \$10,000 forfeiture on the College for alleged violation of Section 73.3527 of the Rules by “failing to retain all required documentation in the WTXR(FM), public inspection file...”<sup>1</sup>

Attachment 1 hereto is a copy of the budget summary report for the 12 month period ending June 30, 2012, for the student-run station which reveals that the annual budget for the operations of WTXR is \$2,087.00. The budget report for WTXR shows the station’s expenses for all of fiscal year 2011-12 as well as the budget for that year.

<sup>1</sup> This Supplement is filed at the invitation of the Media Bureau to provide additional information for its consideration in connection with this case. Pursuant to Section 1.106(f), a Petition for Leave to Accept Supplement to Petition for Reconsideration is being filed simultaneously.

The grand total expenses for the full year amounted to \$862.80 out of the full year WTXR budget of only \$2,087. The budget report further shows that the only personnel expense line WTXR has, both for its actual expenses and its budget, is student wages. This is to compensate its two student managers. No staff or faculty wages are reported. Counsel is informed that the WTXR budget for the current fiscal year (2012-13) is once again \$2,087. As of September 30, 2012, WTXR did not have any charges to its budget. The other \$718 covers license fees. The College does not have a budget for anything other than student workers or license fees, but the small budget shows that WTXR clearly is not a station with paid staff or with the resources a non-student-run station would have. WTXR is overseen by a Communication Professor in the role of "faculty advisor", but her salary is not tied to her role at the radio station.

Attachment 2 hereto is a copy of page 42 from the College's Catalog that explains that WTXR is maintained "entirely for student use."<sup>2</sup> That page provides, in pertinent part:

The Communication Studies major also offers a concentration for those who want to pursue a more dedicated line of study in Mass Communication (MCM). The Mass Communication concentration seeks to produce culturally informed citizens with a high degree of media literacy who are thus well-equipped for service to the Kingdom in the creation and reception of mediated communication forms. **The Communication Department maintains a FCC licensed radio station, WTXR, entirely for student use**, as well as graphic design and television and video production equipment enabling students to gain hands-on experience in their field. The student interested in print media has the opportunity to gain practical experience by working with our student-run webbased

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<sup>2</sup>The College is also licensee of four other noncommercial educational stations and two FM translators which are operated by a professional staff. Those stations are WRAF, Toccoa Falls, GA; WEPC, Belton, SC; WTFH, Helen, GA; WPFJ, Franklin, NC; W221AZ, Lilburn, GA and W265AZ, Franklin, NC.

newspaper, The Talon. The Department also oversees production of The Forrester, the college yearbook. [emphasis added.]

Other documentation includes Attachment 3, a copy of the "official" Communication Department brochure, which is given to prospective students from the department directly as well as admissions. Under "What We Do" it states, "Be a part of these student-led, student-run campus organizations overseen by the Communication Department." It then lists WTXR 89.7 FM and the other three student-run organizations.

In light of the foregoing additional information and the arguments set forth in the College's Petition for Reconsideration, the College respectfully requests the MB to vacate the *Forfeiture Order* and terminate this proceeding.

Respectfully submitted,

TOCCOA FALLS COLLEGE

A handwritten signature in black ink, appearing to read 'Gary S. Smithwick', written over the printed name of the college.

By: Gary S. Smithwick  
Its Counsel

**Smithwick & Belendiuk, P.C.**  
5028 Wisconsin Avenue, N.W.  
Suite 301  
Washington, DC 20016  
202-363-4560

November 1, 2012

ATTACHMENT 1

Toccoa Falls College  
 Monthly Budget Summary Report  
 WTXR Radio 01-1720  
 For the Twelve Months Ending June 30, 2012

Object	Account Description	June Amt	FY to Date	Approved Budget	Budget Balance
Revenues:					
-----					
Expenses:					
Personnel Expenses:					
51400	TFC Student Wages			\$1,369.00	\$1,369.00
51500	Fed'l College Work Study Wages		305.81		(305.81)
-----					
	Total Personnel Expenses		305.81	1,369.00	1,063.19
Operating Expenses:					
60110	Supplies/General Expense		556.99	718.00	161.01
-----					
	Total Operating Expenses		556.99	718.00	161.01
Transfers:					
-----					
-----					
	Total Expenses		862.80	2,087.00	1,224.20
-----					
	Net Departmental Expenses		\$862.80	\$2,087.00	\$1,224.20
=====					

ATTACHMENT 2

# COMMUNICATION DEPARTMENT

(706) 886-7299, ext. 5270  
e-mail: communication@tfc.edu

## INTRODUCTION

The Communication Department offers programs of study that emphasize both human interaction and mediated communication. With concentrations in Interpersonal & Public Communication and Mass Communication, students are given the opportunity to explore the major areas of Communication Studies.

The study of communication at Toccoa Falls College offers a broad range of training and skill development in a Christian setting. It focuses on the clear organization and expression of ideas. It also develops written and technological skills. The programs are designed to help students master the tools and techniques of effective communication in their chosen field by providing hands-on experience in an academic environment. On a deeper level, they also provide an understanding of the purposes and moral principles of communication. These programs integrate communication skills and practice with a biblically informed understanding of the Christian worldview. The combination of an understanding of foundational communication theory together with proficiency in communication provides a skill-base sufficient to pursue employment or graduate work with confidence.

## PROCEDURE FOR ADMISSION

A student desiring to pursue a major in the Communication Department should complete a Declaration of Major form as an applicant to the Communication Department. Students completing the form should arrange an appointment with the chair of the Communication Department to discuss spiritual and academic status. Students must hold a cumulative 2.0 grade point average, and have earned at least 12 semester hours, to be considered for admittance.

## GRADUATION REQUIREMENTS (B.A. or B.S.)

1. Fulfillment of all the "General Requirements for Graduation" (see section on "Degree Requirements")
2. Satisfactory completion of the hours in Communication as outlined below. A minimum grade of "C-" will be required for each course that applies toward a major in the Communication Department, and a cumulative average of 2.0 will be required for the total hours applied to the major.
3. The B.A. degree requires the completion of two years of the same language that may be taken in place of electives. Both semesters of Intermediate Greek or Hebrew will fulfill Bible & theology elective requirements as well as the language requirement for the B.A. degree.
4. A minimum grade of "C-" for each course taken to fulfill requirements for a minor if the student elects to have a minor.
5. Satisfactory completion of a Senior Portfolio that provides evidence of successful attainment of the outcomes of the major.
6. Satisfactory completion of the comprehensive oral examination. The oral exam will be taken during one of the final two semesters at Toccoa Falls College.
7. Satisfactory completion of an analytical response paper that seeks to address the issue of Christ and Culture from a biblically and theologically informed position. Specific consideration will be paid to how this response is articulated in the student's chosen professional area.

Majors of the Communication Department are held to a high standard consistent with their calling. The standards are expressed in the following requirements, goals and outcomes.

## COMMUNICATION STUDIES MAJOR PURPOSE & OUTCOME GOALS

The major in Communication Studies provides training and education necessary for a successful life in the many areas supported by professional communication. Regardless of the concentration, the Communication student will gain valuable knowledge, skills and an attitude necessary for pursuing his/her career and life goals.

The Communication Studies major offers a concentration in the broader area of Interpersonal & Public Communication (IPC). IPC students will gain insights into the how and why of human interaction, as well as how to strategically represent themselves and organizations. Students in the IPC concentration will have the opportunity to focus on the knowledge and skills essential in leadership, public relations and a number of other areas supported by the field of human communication. Hands-on experience can be gained through specific involvement in field-related work areas involving our several student-run media outlets and other department related activities. Additionally, through internships, IPC majors will have a chance to work alongside professionals in their desired career areas.

The Communication Studies major also offers a concentration for those who want to pursue a more dedicated line of study in Mass Communication (MCM). The Mass Communication concentration seeks to produce culturally informed citizens with a high degree of media literacy who are thus well-equipped for service to the Kingdom in the creation and reception of mediated communication forms. The Communication Department maintains a FCC licensed radio station, WTXR, entirely for student use, as well as graphic design and television and video production equipment enabling students to gain hands-on experience in their field. The student interested in print media has the opportunity to gain practical experience by working with our student-run web-based newspaper, The Talon. The Department also oversees production of The Forrester, the college yearbook.

The learning objectives for this major include the following:

- Learning fundamental principles, generalization or theories of communication (IDEA 2)
- Learning to apply course material in the context of professional communication (IDEA 3)
- Developing skill in expressing oneself orally or in writing at a level appropriate of a professional communicator (IDEA 8)
- Developing a clearer understanding of, and commitment to, personal biblical values—appropriate to a Christian communicator in intellectual and practical matters (IDEA 10)
- Learning to analyze and critically evaluate ideas, arguments, and points of view of communication and communicative acts (IDEA 11)

ATTACHMENT 3



**Some Career Options for Communication Majors**

Floor manager, talk show host, radio news director, film director, film marketing, script writer, media critic, DJ, TV reporter, TV producer, supervisor, anchor, publicists, marketer, sports announcer, gallery manager, editor, manager, journalist, newspaper publisher, webmaster, production assistant, product manager, intercultural communication consultant, copywriter, advertising executive, PR coordinator, HR specialist/manager, spokesperson, fashion merchandiser, events planner, wedding consultant, tour guide, museum curator, travel manager, hotel manager, camp director, theater manager, careers in higher education: admissions, student services, student activities, recruiter, dean, alumni coordinator, communication researcher, consultant, motivational speaker, speechwriter, telecommunications specialist & more!

**What We Do**

Be a part of these student-led, student-run campus organizations overseen by the communication department. From snapping photos to shooting videos to getting "the scoop" to letting your voice be heard, there is something for you to express yourself here at TFC!

**On-Campus Opportunities**

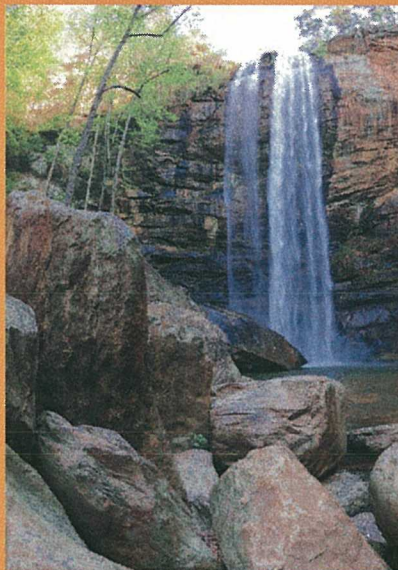
Eagle Vision (video production)  
WTRR 89.7 fm (radio)  
The Talon (student newspaper)  
Forrester (yearbook)

*You really can't go wrong with a major—or minor—in communication. It's distinct from other majors in culture yet integrated and applicable in subject. You learn skills and concepts that relate to a wide range of disciplines, even after graduation it's an appealing avenue because you are able to professionally articulate and practice the knowledge of your craft.*

—Janna Carroll & Rachel Gruber, Counseling Psychology majors & Interpersonal Communication minors

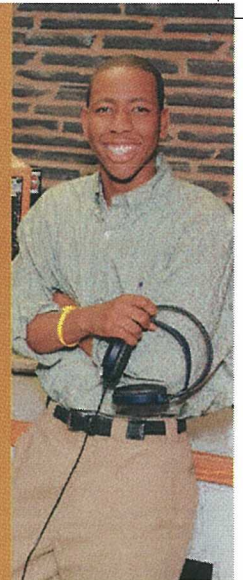
passionate faith  
authentic community  
globally engaged

*Where Character Is  
Developed With Intellect*



Toccoa Falls College  
Communication Dept  
PO Box 800025  
Toccoa Falls, GA 30598  
1-706-886-7299, ext. 5270 • comm@tfc.edu  
Admissions: 1-888-785-5624  
admissions@tfc.edu

TOCCOA FALLS COLLEGE  
communication  
department



[www.tfc.edu](http://www.tfc.edu)

Founded  
1907

## Communication Department

*One cannot NOT communicate!*

### About Us

The Communication Department offers programs of study that emphasize both human interaction and mediated communication. With concentrations in Interpersonal & Public Communication and Mass Communication, students are given the opportunity to explore the major areas of Communication Studies.

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### Communication Concentrations

#### Interpersonal & Public Communication (IPC)

In the IPC concentration students will gain insights into the how and why of human interaction, as well as how to strategically represent themselves and organizations. Students in the IPC concentration will have the opportunity to focus on the knowledge and skills essential in Leadership, Public Relations

and a number of other areas supported by the field of human communication. Hands-on experience can be gained through specific involvement in field related work areas involving our several student-run media outlets and other department related activities. Additionally, through internships, majors will have a chance to work along-side professionals in their desired career areas.

#### Mass Communication

The concentration in Mass Communication provides professional training that can lead directly to employment and service to the Kingdom in the field of mass communication by studying issues in mass media and production techniques as well as the theory behind both.

The Communication Department maintains a FCC-license radio station WTXR entirely for student use as well as graphic design and television and video production equipment enabling students to gain hands-on experience in their field. The student interested in print media has the opportunity to gain practical experience on our student-run web-base newspaper, The Talon. We also over-see production of The Forrester, the college yearbook.

#### Minors

Journalism  
Leadership  
Public Relations

