



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

ORIGINAL



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In the Matter of Broadcast Station WWXX, 94.3 FM

7900 Sudley Rd., Buckland VA 20109  
Facility ID 16819, BRH -20110601 ACB

Licensee Red Zebra Broadcasting, 1801 Rockville Pike, Rockville MD

Accepted/Files

OCT 14 2014

Federal Communications Commission  
Office of the Secretary

**PRELIMINARY\* FORMAL PETITION TO DENY RENEWAL  
OF STATION'S FCC BROADCAST LICENSE PURSUANT TO 47 U.S.C.A. § 309(d),  
AS WELL AS ANY OTHER APPLICATIONS, MOTIONS, OR REQUESTS  
OR, IN THE ALTERNATIVE, AN INFORMAL OBJECTION TO ALL OF THE ABOVE,  
PRIMARILY BECAUSE OF ITS DELIBERATE, CONTINUED, AND UNNECESSARY  
BROADCAST, DURING PRIME TIME, OF A RACIST RACIALLY DEROGATORY WORD,  
AND ITS DELIBERATE PROMOTION OF THAT TERM BY OTHER BROADCASTERS**

Petitioner Jay Winter Nightwolf.["Petitioner"], a proud Native American and a listener to station WWXX-FM, respectfully requests on behalf of himself and others similarly situated, and who are like himself adversely affected or aggrieved, that the agency deny the renewal of this station's license and any other requests because it deliberately, repeatedly, and unnecessarily broadcasts the word "R\*dskins" during most of its broadcasting day, and especially in prime time where its well documented adverse impact on impressionable young Indian as well as non-Indian children is greatest.

Petitioner adopts, and hereby incorporates by reference, the petition with the same title filed by John F. Banzhaf III on or about September 2, 2014 [the "Banzhaf Petition"], and makes the same arguments and assertions, and upon information and belief, makes the same allegations of fact.

For this reason Petitioner respectfully requests that he be added as a party to and in support of the Banzhaf Petition, or, in the alternative, that the instant petition be denominated as a separate petition but joined with and considered with the Banzhaf petition in a single proceeding.

\* Petitioner respectfully seeks to reserve the right to supplement and otherwise amplify upon this petition as may in the future become necessary and appropriate, and to aid the FCC.

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**AFFIDAVIT OF PETITIONER FURTHER IDENTIFIED BELOW  
IN SUPPORT OF HIS PRELIMINARY FORMAL PETITION TO DENY RENEWAL  
OF STATION'S FCC BROADCAST LICENSE PURSUANT TO 47 U.S.C.A. § 309(d)**

1. My name is Jay Winter Nightwolf. I am a proud Native American.
2. My address is 9000 Nancy Lane, Fort Washington, MD, 20744
3. I listen to station WWXX-FM, and I am somewhat familiar with its broadcasting. Based upon that listening, it appears that the station uses the word "R\*dskins" unnecessarily and very frequently, probably much more frequently than most other stations. It also advertises businesses in Washington, D.C., Virginia, and Maryland with which I have close connections.
4. I am adversely affected or aggrieved by the broadcasting of this station.
5. Upon information and belief, I affirm the correctness of the allegations of fact contained in the petition.
6. I also certify that I caused a copy of this document to be mailed to WWXX, 1801 Rockville Pike, Rockville, MD.
7. I have experienced and/or witnessed harm to myself and/or to other Native Americans which I believe was caused by the frequent repetitive use of the word "R\*dskins" on the air.



*Jay Winter Nightwolf*  
PETITIONER'S SIGNATURE

SWORN TO BEFORE ME THIS 13th DAY OF October, 2014.

DONALD W. HENSHAW  
NOTARY PUBLIC DISTRICT OF COLUMBIA  
My Commission Expires August 14, 2017