

Group R
FA

Received & Inspected



FCC Mail Room

PASCO L. SCHIAVO
ATTORNEY AT LAW

199 NORTH CHURCH STREET
1 COLUMBUS PLACE
HAZLETON, PENNSYLVANIA 18201-5874

(570) 454-3583 • FAX: (570) 455-2199
Email: plschiavolaw@epix.net

RECEIVED

2014 JUL 23 A 5:46

ADVIS SERVICE CENTER

BRED-20140331 A10

~~RECEIVED~~

July 16, 2014

Mariene H. Dortch, Secretary
Federal Communications Commission
Washington D.C. 20554

RE: Application for renewal of Radio Broadcasting licenses of WRTI (FM) and satellite stations

Dear Secretary Dortch:

I am writing in response to the July 11, 2014 letter of Fletcher, Heald & Hildreth, counsel for WRTI (FM) in this matter, and with particular reference to its commentary on my April 10, 2014 letter to you as to why the Hazleton area community is excluded from broadcast service of WRTI(FM) and satellite stations. A copy of that letter is enclosed herewith for your immediate reference.

While that April 10, 2014 letter speaks for itself, I must address the other commentary of counsel for WRTI(FM) in its July 11, 2014 letter to you.

A copy of my letter was not served on Temple University, the owner of WRTI(FM), because I was not instructed to do so even after I wrote my March 21, 2014 letter to WRTI(FM) to inform it of the very strong possibility that I would be writing to your Commission. A copy of my March 21, 2014 letter is enclosed herewith.

I am now being chided by counsel for WRTI(FM) for not having characterized my April 10, 2014 letter as a formal objection to its license renewal. If this is necessary to have your Commission review its application for license renewal in light of the subject of my letter, then please consider that letter as my formal objection to the license renewal of WRTI(FM) as of April 10, 2014.

In the December 16, 2013 letter of David S. Conant, General Manager of WRTI(FM), to me he made short shrift of the courteous request in my December 10, 2013 letter to him to have WRTI(FM) establish a reasonably clear signal for the Hazleton area community where over 72,000 people, including me, reside.

He stated that the Hazleton area community cannot be served because of its being amid a series of mountain ridges and so forth. The Pottsville area community to our south and the Wilkes-Barre area community to our north and the Scranton area community to our northwest and the Jackson Township/Mt. Pocono area community to

our east are all amid a series of mountain ridges; yet, they have not only clear broadcast signals but actual broadcasting facilities of WRTI(FM) providing the same. His next contention is that all of his station's transmitters and translators are operating at their legally allowable power levels which means increases in power are not an option and, even so, it is not a certainty that would solve the problem. I do not know if what he is saying is true; however, I do know if he did not take the first step to research what he spoke about. The Pottsville and Jackson Township/Mt. Pocono area communities each have half the population of the Hazleton area community.

He next states that setting up a "broadcasting facility" is time consuming and expensive involving research for available frequencies, application to the FCC for permission to build and, if approved, secure the necessary funding and so forth. He thereby impliedly admits that such was done for all of the above served communities which virtually surround the Hazleton area community, the "hole" in the donut of public broadcasting by WRTI(FM).

That being said, it now becomes incumbent upon WRTI (FM) to present true and complete and not condescending replies on all the issues raised by it, including but not limited to the histories behind how its satellite broadcasting facilities were established in those four served communities and whether consideration was given to the average economic income of the above served communities before doing so.

Thank you for your consideration. I look forward to hearing from you if you so desire to contact me. I will be glad to appear to testify at any hearing before you on the above in Washington D.C. or any other place in the United States; however, I will be out of the country from July 18 to August 4, 2014.

Sincerely,



Pasco L. Schiavo

PLS:kjms
Enclosures

cc: Fletcher, Heald & Hildreth
w/encls.