

Ms McCauley:

Your patience with my response is greatly appreciated, please allow me to respond as completely as I possibly can on this matter. I understand that you are just doing your job, and much of it is probably quite thankless; so thank you for letting me try to answer your letter properly.

It is very clear that you are using a boilerplate letter, since I can read a dozen of these exact statements in other filings from the FCC. The wording in the footnote you reference has been repeated many times, but I caution you that the circumstances are not the same with every station to which these letters are sent. I implore you to please hear my response carefully, because I am responding to all of the items noted in the letter and the footnote.

You specifically are requesting proof of operations **for the entire period** in question (your emphasis added). I ask you to understand that such "proof" simply does not exist in the manner you request.. After the STA you're only talking four months of operation. Let me explain.

1 - Dates Broadcasts ceased and resumed.

This was clearly stated in the filings previously provided to the FCC. The STA request and the subsequent Resumption Notice was filed by me personally. Both of those filings contain the language "*I hereby certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations*" which have my name attached. Thus, I have made sworn statements as to the dates on which broadcasts ceased and resumed. Your decision to rescind the Resumption Notice has no bearing on the fact that I have sworn to those dates appropriately.

2 Transmitter site location, effective radiated power and antenna height above ground level for all periods of operation.

These facts, besides being commonly available knowledge in the FCC database, were attested to by my filing of the Resumption Notice and declaring that the station was operating as authorized in the latest FCC license issued. It is noted that this statement from the boilerplate letter is mostly inapplicable to AM stations, as they have no Effective Radiated Power or Antenna Height above ground level as a part of their license.

3. This evidence includes copies of leases, personnel records, engineering records, station logs (including EAS logs), quarterly issues/programs lists, invoices, bills, checks written or received, credit card charges, wire transfers or deposits of funds relating to the station's operation from November 4, 2019, to the present.

I have attempted to demonstrate that these kinds of records do not exist in a manner which seems to appease your request. I have provided you EAS logs, Issues and Programs lists and utility records for the site. However, you are correct that none of these actually demonstrate that the station has operated "for the entire period" that you request. EAS logs are only generated when there is EAS activity; Issues and Programs lists are only developed when programming airs and are only submitted quarterly; and utility bills are only generated monthly and reflect usage during an applicable time period. The financial transactions of my radio operations group are not

segregated by station, and even if they were, that would not provide any "proof" that the station has operated as you have required. There is, in fact, no possible "proof" that you are requesting that would indicate that the station has operated "for the entire period" - this is not 1980, and daily program logs and hourly transmitter readings are no longer required to be maintained. I'm a 74 year old lifelong veteran of radio broadcasting doing everything I know to do in order to try and meet the needs of my community using radio stations. This last year has been the most difficult in my career. Since the Pandemic we have lost 32% of our revenue and have been reduced to three employees and they are working at reduced pay. We are trying to sell WKGC-AM to help put the company back on track. With that sale the new owner will be investing into the station (WKGC-AM) with new studios and working capital while we will be able to hire a couple new employees to operate our stations better and to hopefully get back to normal.

4. Also include pictures of the station's facilities during this timeframe, and provide exact transmitter site coordinates

I have provided you photos of the tower site and of the operation of the equipment at the station. It is silly to ask for exact transmitter site coordinates, as that is also common public information; I have already certified that the station was operating per the last issued FCC license, which contains those coordinates. It is noted that this part of the boilerplate footnote is also not applicable to this situation, as we had not requested operation at variance from that licensed to the station.

Ms McCauley, I'm sorry that you have had to expend so much time on this process, it has not been my intention to be uncooperative or difficult. The statements that I have provided are the best that can be given to you for the assertion of the station operations. I want you to understand that what you are asking from your form letter is not applicable in this circumstance, and simply is not a possibility in a manner that seems to meet your demands. I have always held the FCC in high regard for being a supporter of us out here in the trenches trying to serve our communities, and specifically thought the FCC was a backer of AM stations. Your seeming determination to find a reason to cancel my station license is seriously disappointing and certainly is not in the spirit of the mission of the FCC. I'm certain that you have supervisors who may, or may not, be reviewing your correspondence with me on this matter, and if you arbitrarily decide that I've not been cooperative or complete in my response and choose to delete my license, you will leave me little recourse than to seek their counsel on why you would deem that an appropriate action when I have been compliant in your requests.

Thank you again for your kind consideration of my situation

Respectfully,

Ron Hale... etc.