

Keys, LaKeshia

From: Jeff Cotton [jc@openskyradio.org]
Sent: Sunday, May 13, 2012 7:13 PM
To: crb
Subject: Docket No. 2011-2 CRB NCEB II-Royalty rates for rural NCE-FM stations

Honorable Judges,

Please consider that the past and proposed lowest tier of Royalty rates is for stations serving a population of less than 249,000 people. This places an unfair and unjust burden on rural stations, many of which serve less than 10,000 people. Our organization's three stations (two English, one Spanish-language) serve five towns with a total population of less than 2,000. The current royalty burden is crushing, amounting to over \$4000.00/year and may indeed force one or more off the air.

The tiered structure was put in place to lower the burden for stations serving smaller markets. However, in our case, we are subject to a rate of nearly \$4.00 per capita. No station in the upper tiers could survive such an unfair burden.

In light of the many rural LPFM stations that will be coming online and the many rural stations now serving markets of less than 25,000 people, I respectfully request consideration of both a lower tier of 25,000 with a rate one-tenth of the lowest tier and an exemption zone for stations serving less than 5,000.

In closing, the title of Docket No. 2011-2 CRB NCEB II is: "*Determination of Reasonable Rates and Terms for Noncommercial Broadcasting*". There is ***nothing 'reasonable'*** about this rate structure to those who serve the smallest and often most needy markets.

Sincerely,

Jeff Cotton, Director
OpenSkyRadio Corp.