

- **Make information collections and reports more focused, transparent and relevant;**

Dear Ms. Cornell,

The burdensome information collection on the FCC Form 323 biennial ownership report which broadcast stations must submit every two years, and non-biennial ownership reports, is in sore need of review. This comment is separate and apart from the issues that have arisen with the FCC's collection of personal social security numbers for FRNs on such ownership reports.

In a nutshell, the required electronic submission of ownership information on the FCC Form 323 is a time-intensive and mind-numbing process for any FCC licensee that has even a slight complexity to its entity structure. The current FCC Form 323 is a form requesting information which, because of basic deficiencies in the form, yields data that is largely unreliable.

(The call signs and information from the clips below are for example only and these comments are not submitted on that licensee's behalf).

The Electronic Form is a Step-Child of a Former Paper Form: Many of the issues with this required form result from the ill-thought-out transition from a paper form to the current electronic form. In designing the latest electronic form, the FCC attempted to force feed information that was previously submitted through text exhibits in CDBS into specific data fields without enough thought as to either the integrity of the data that would be collected, or the mind-numbing task it was creating for licensees.

My perverse wish is to give a Chairman Wheeler, or possibly you, a relatively simple broadcast station licensee structure, and to watch the hours and hours pass while you or the Chairman attempt to complete and file the required forms.

Some examples from the form itself of the unnecessary complexity and burdens:

Section I, Question 7 below, in the previous paper version of the report allowed a parent entity to list all licensees for which it was a parent to, and for the parent to simply file one parent report. Now, a parent entity must file separate parent reports for each licensee entity, in addition to the licensee

reports that must also be filed by the licensee. Thus, for a parent entity owning an interest in 10 licensees, 20 reports must be filed. There is no reason for this extra burden. Multiple licensees should be able to be listed as the same parent entity will not have different structures for different licensees (it cannot by definition).

7.	Licensee and Station Information. The stations listed below are all licensed to the following person or entity:			
	Licensee Name	Licensee's FCC Registration Number (FRN)		
	V.L.N. BROADCASTING, INC.	0001788546		
Station List				
This Report is filed for the following stations:				
Copy	Call Sign	Facility ID Number	Location (City/State)	Class of service
1.	WVLN	69633	OLNEY , ILLINOIS	AM Station
2.	WSEI	69634	OLNEY , ILLINOIS	FM Station
3.	WIKK	58366	NEWTON , ILLINOIS	FM Station

Section II, Question 3(a): The filer is required to duplicate in the first fields the information already given in Section I, Question 1. There is no reason for this duplication.

3. (a.)	Ownership Interests. This Question requires Respondents to enter detailed information about ownership interests by generating a series of subforms. Answer each question on each subform. The first subform listing should be for the Respondent itself. If the Respondent is not a natural person, also list each of the officers, directors, stockholders, noninsulated partners, members and other persons or entities with a direct attributable interest in the Respondent. (A interest is one that is not held through any intervening companies or entities.) In the case of vertical or indirect own structures, report only those interests in the Respondent that also represent an attributable interest in the Licensee for the Report is being submitted.		
	List each person or entity with a direct attributable interest in the Respondent separately. Entities that are part of an organizational structure that includes holding companies or other forms of indirect ownership must file separate own reports. In such a structure do not report or file separate reports for persons or entities that do not have an attributable in the Licensee for which the report is being submitted.		
Ownership Interests Information			
Copy	Name	KEY BROADCASTING, INC.	
1.	Address	Street P.O. BOX 1227 City/State CORBIN , KENTUCKY Postal/ZIP Code 40702 - Country (if not U.S.) US	

Section II, Question 3(a): After the filer is asked to duplicate the information given in Section 1, Question 1, the question asks for percentage of votes, percentage of equity and percentage of total assets. This is a nonsensical request for information as it is asking the licensee or respondent to give percentages of votes in what - itself? The FCC's staff at first informally advised filers to insert 100% in each of these three boxes which led to the absurd result of each report showing total ownership in an entity of approximately 200%. Now the FCC staff informally advises that 0% be inserted. Either way, the data field is nonsensical

	US
Percentage of votes	0.0 %
Percentage of equity	0.0 %
Percentage of total assets (equity debt plus)	0.0 %

Section II, Question 3(a): Recent informal FCC staff advice has stated that the "Percentage of total assets (equity plus debt)" response should be zero unless the listed person or entity has an "equity/debt-plus" interest in the respondent. Thus, for an individual who owns 100% of all stock in a closely held entity, the advised response is zero for the third box reporting "Percentage of total assets". This is a surprise to any small business-person who owns 100% of his or her entity to learn that the FCC wants the report to state that he or she has no ownership interest in the assets. To my knowledge, few who are filing these reports are aware of this interpretation so most filers are reporting 100%. But, of what use is this data if different filers and FCC staff are interpreting the requested information in substantially different ways.

Also, the FCC's staff has informally advised that if a husband and wife jointly own corporate stock, each should be listed and the jointly-owned percentage be inserted into these boxes. Thus, for husband/wife joint ownership of 100%, the ownership report data will reflect the entity having 200% ownership and more importantly for the data collection purposes, if a couple jointly owns 50% of the corporate stock, and both are minorities while the other 50% owner is not, the data will reflect an ownership of 100% as minority-owned which is wholly incorrect as a matter of data veracity. Also, the fields do not allow for tenths of percentages which causes total ownership

listed to often be less than or more than 100% which again is a matter of data integrity.

	US
Percentage of votes	100.0 %
Percentage of equity	100.0 %
Percentage of total assets (equity debt plus)	100.0 %

Section II, Question 3(a): This question asks for gender, ethnicity and race information on the biennial report, but does not ask for this information on non-biennial reports that are required to be filed. Thus, a licensee filing any non-biennial report for an entity is now faced with having to go back and re-enter gender, ethnicity and race information for each such report in which a non-biennial report was filed.

Gender, Ethnicity, Race and Citizenship Information (Natural Persons)	<input type="checkbox"/> N/A (entity)
	<u>Gender</u> <input checked="" type="radio"/> Male <input type="radio"/> Female
	<u>Ethnicity</u> <input type="radio"/> Hispanic or Latino <input checked="" type="radio"/> Not Hispanic or Latino
	<u>Race (Check all that apply)</u> <input type="checkbox"/> American Indian or Alaska Native <input type="checkbox"/> Asian <input type="checkbox"/> Black or African American <input type="checkbox"/> Native Hawaiian or Other Pacific Islander <input checked="" type="checkbox"/> White

Section II, Question 3(c): This response is the most burdensome, repetitive, and outside the realm of what the FCC is charged with collecting on these reports. Attached are the 22 pages of the response to this question for just one report for a small market licensee.

For larger licensees, the responses to Section II, Question 3(c) can involve thousands of entries. In addition, while the FCC allows for spreadsheets to be used, the spreadsheets are generally different for each subsidiary or parent report, and are also different for biennial and non-biennial reports.

This question is burdensome because it yields no information that the FCC does not already have from the contemporaneous

reports being filed. Each of the individuals and stations listed in Section II, Question 3(c) are required to be listed on a parent, licensee or subsidiary report associated with the noted station. Thus, this information is simply a recitation in a different form of that information. Further, the FCC's rule section on radio ownership, Section 73.3555, no longer restricts national ownership for radio stations. The FCC's staff, however, interprets the question so as to require that all radio broadcast stations nationally be listed even though such information has no relevance to current FCC rules, unlike when the paper form was originally created decades ago when national radio ownership did have relevance.

Thank you for the consideration of these concerns with the FCC Form 323 biennial ownership reports.

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Local Public File Checklists for 2013: <http://www.garziglia.com/checklists>

"The best way to hire a broadcast station lawyer is to ally with a tenacious, industry-knowledgeable counselor who has a passion for broadcasting" -- JFG

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(c.) Does the Respondent or any person/entity with an attributable interest in the Respondent also hold an attributable interest in any other broadcast station, or in any newspaper entities in the same market, as defined in 47 C.F.R. Section 73.3555?

If "Yes", provide information describing the interest(s), using EITHER the subform OR the spreadsheet option below for the applicable type of interest (broadcast or newspaper). Respondents with a large number (50 or more) of entries to submit should use the spreadsheet option. NOTE: Spreadsheets must be submitted in a special "XML Spreadsheet" format with the appropriate structure that is specified in the documentation. For instructions on how to use the spreadsheet option to complete this question (including templates to start with), please [Click Here](#).

Broadcast Interest Information								
Copy	Name of Interest Holder	Call Sign	Community of license	Facility ID Number	Percentage of Votes	Percentage of Equity	Percentage of total assets (EDP)	Positional Interest (Check all that apply)
1.	TERRY E. FORCHT	WVLN	City OLNEY State ILLINOIS	69633	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
2.	TERRY E. FORCHT	WSEI	City OLNEY State ILLINOIS	69634	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
3.	TERRY E. FORCHT	WIKK	City NEWTON State ILLINOIS	58366	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder <input type="checkbox"/> Attributable

								Entity <input type="checkbox"/> Other (please specify):
4.	TERRY E. FORCHT	WHOP	City HOPKINSVILLE State KENTUCKY	27634	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
5.	TERRY E. FORCHT	WHOP-FM	City HOPKINSVILLE State KENTUCKY	27633	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
6.	TERRY E. FORCHT	WANV	City ANNVILLE State KENTUCKY	162367	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
7.	TERRY E. FORCHT	WFTG	City LONDON State KENTUCKY	20412	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder

								<input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
8.	TERRY E. FORCHT	WWEL	City LONDON State KENTUCKY	20413	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
9.	TERRY E. FORCHT	WAIN	City COLUMBIA State KENTUCKY	67857	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
10.	TERRY E. FORCHT	WAIN-FM	City COLUMBIA State KENTUCKY	67714	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
11.	TERRY E. FORCHT	WSIP	City PAINTSVILLE State KENTUCKY	58403	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner

								<input checked="" type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
12.	TERRY E. FORCHT	WSIP-FM	City PAINTSVILLE State KENTUCKY	60502	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
13.	TERRY E. FORCHT	WTCW	City WHITESBURG State KENTUCKY	64431	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
14.	TERRY E. FORCHT	WXKQ-FM	City WHITESBURG State KENTUCKY	64430	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
15.	TERRY E. FORCHT	WCDQ	City CRAWFORDSVILLE State INDIANA	74304	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited

								Partner <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder Attributable Entity <input type="checkbox"/> Other (please specify):
16.	TERRY E. FORCHT	WCVL	City CRAWFORDSVILLE State INDIANA	8093	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
17.	TERRY E. FORCHT	WIMC	City CRAWFORDSVILLE State INDIANA	8094	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
18.	TERRY E. FORCHT	WYKY	City SCIENCE HILL State KENTUCKY	170490	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
19.	TERRY E. FORCHT	WTLO	City SOMERSET State	14726	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director

			KENTUCKY					<input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
20.	MIKE TARTER	WVLN	City OLNEY State ILLINOIS	69633	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
21.	MIKE TARTER	WSEI	City OLNEY State ILLINOIS	69634	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
22.	MIKE TARTER	WIKK	City NEWTON State ILLINOIS	58366	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):

23.	MIKE TARTER	WHOP	City HOPKINSVILLE State KENTUCKY	27634	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
24.	MIKE TARTER	WHOP-FM	City HOPKINSVILLE State KENTUCKY	27633	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
25.	MIKE TARTER	WANV	City ANNVILLE State KENTUCKY	162367	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
26.	MIKE TARTER	WFTG	City LONDON State KENTUCKY	20412	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other

								(please specify):
27.	MIKE TARTER	WWEL	City LONDON State KENTUCKY	20413	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
28.	MIKE TARTER	WAIN	City COLUMBIA State KENTUCKY	67857	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
29.	MIKE TARTER	WAIN-FM	City COLUMBIA State KENTUCKY	67714	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
30.	MIKE TARTER	WSIP	City PAINTSVILLE State KENTUCKY	58403	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable

								Entity <input type="checkbox"/> Other (please specify):
31.	MIKE TARTER	WSIP-FM	City PAINTSVILLE State KENTUCKY	60502	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
32.	MIKE TARTER	WTCW	City WHITESBURG State KENTUCKY	64431	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
33.	MIKE TARTER	WXXQ-FM	City WHITESBURG State KENTUCKY	64430	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
34.	MIKE TARTER	WCDQ	City CRAWFORDSVILLE State INDIANA	74304	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder

								<input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
35.	MIKE TARTER	WCVL	City CRAWFORDSVILLE State INDIANA	8093	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
36.	MIKE TARTER	WIMC	City CRAWFORDSVILLE State INDIANA	8094	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
37.	MIKE TARTER	WYKY	City SCIENCE HILL State KENTUCKY	170490	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
38.	MIKE TARTER	WTLO	City SOMERSET State KENTUCKY	14726	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner

								<input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
39.	DENNIS CUPP	WVLN	City OLNEY State KENTUCKY	69633	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
40.	DENNIS CUPP	WSEI	City OLNEY State KENTUCKY	69634	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
41.	DENNIS CUPP	WIKK	City NEWTON State ILLINOIS	58366	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
42.	DENNIS CUPP	WHOP	City HOPKINSVILLE State KENTUCKY	27634	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited

								<input type="checkbox"/> Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
43.	DENNIS CUPP	WHOP-FM	City HOPKINSVILLE State KENTUCKY	27633	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
44.	DENNIS CUPP	WANV	City ANNVILLE State KENTUCKY	162367	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
45.	DENNIS CUPP	WFTG	City LONDON State KENTUCKY	20412	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
46.	DENNIS CUPP	WWEL	City LONDON State	20413	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director

			KENTUCKY					<input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
47.	DENNIS CUPP	WAIN	City COLUMBIA State KENTUCKY	67857	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
48.	DENNIS CUPP	WAIN-FM	City COLUMBIA State KENTUCKY	67714	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
49.	DENNIS CUPP	WSIP	City PAINTSVILLE State KENTUCKY	58403	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):

50.	DENNIS CUPP	WSIP-FM	City PAINTSVILLE State KENTUCKY	60502	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
51.	DENNIS CUPP	WTCW	City WHITESBURG State KENTUCKY	64431	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
52.	DENNIS CUPP	WXKQ-FM	City WHITESBURG State KENTUCKY	64430	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
53.	DENNIS CUPP	WCDQ	City CRAWFORDSVILLE State INDIANA	74304	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other

								(please specify):
54.	DENNIS CUPP	WCVL	City CRAWFORDSVILLE State INDIANA	8093	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
55.	DENNIS CUPP	WIMC	City CRAWFORDSVILLE State INDIANA	8094	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
56.	DENNIS CUPP	WYKY	City SCIENCE HILL State KENTUCKY	170490	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
57.	DENNIS CUPP	WTLO	City SOMERSET State KENTUCKY	14726	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable

								Entity <input type="checkbox"/> Other (please specify):
58.	CLARANCE E. HENSON, JR.	WMSK	City MORGANFIELD State KENTUCKY	68808	51.0 %	51.0 %	51.0 %	<input type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input checked="" type="checkbox"/> Other (please specify): MEMBER
59.	CLARANCE E. HENSON, JR.	WMSK -FM	City STURGIS State KENTUCKY	162349	51.0 %	51.0 %	51.0 %	<input type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input checked="" type="checkbox"/> Other (please specify): MEMBER
60.	JACKIE WILLIS	WVLN	City OLNEY State ILLINOIS	69633	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
61.	JACKIE WILLIS	WSEI	City OLNEY State ILLINOIS	69634	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner

								<input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
62.	JACKIE WILLIS	WIKK	City NEWTON State ILLINOIS	58366	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
63.	JACKIE WILLIS	WHOP	City HOPKINSVILLE State KENTUCKY	27634	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
64.	JACKIE WILLIS	WHOP-FM	City HOPKINSVILLE State KENTUCKY	27633	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
65.	JACKIE WILLIS	WANV	City ANNVILLE State KENTUCKY	162367	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited

								<input type="checkbox"/> Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
66.	JACKIE WILLIS	WFTG	City LONDON State KENTUCKY	20412	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
67.	JACKIE WILLIS	WWEL	City LONDON State KENTUCKY	20413	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
68.	JACKIE WILLIS	WAIN	City COLUMBIA State KENTUCKY	67857	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
69.	JACKIE WILLIS	WAIN-FM	City COLUMBIA State	67714	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director

			KENTUCKY					<input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
70.	JACKIE WILLIS	WSIP	City PAINTSVILLE State KENTUCKY	58403	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
71.	JACKIE WILLIS	WSIP-FM	City PAINTSVILLE State KENTUCKY	60502	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
72.	JACKIE WILLIS	WTCW	City WHITESBURG State KENTUCKY	64431	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):

73.	JACKIE WILLIS	WXXQ-FM	City WHITESBURG State KENTUCKY	64430	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
74.	JACKIE WILLIS	WCDQ	City CRAWFORDSVILLE State INDIANA	74304	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
75.	JACKIE WILLIS	WCVL	City CRAWFORDSVILLE State INDIANA	8093	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
76.	JACKIE WILLIS	WIMC	City CRAWFORDSVILLE State INDIANA	8094	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other

								(please specify):
77.	JACKIE WILLIS	WYKY	City SCIENCE HILL State KENTUCKY	170490	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
78.	JACKIE WILLIS	WTLO	City SOMERSET State KENTUCKY	14726	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
79.	TERRY E. FORCHT	WKYH	City PAINTSVILLE State KENTUCKY	3430	100.0 %	100.0 %	100.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input checked="" type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
80.	MIKE TARTER	WKYH	City PAINTSVILLE State KENTUCKY	3430	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable

								Entity <input type="checkbox"/> Other (please specify):
81.	DENNIS CUPP	WKYH	City PAINTSVILLE State KENTUCKY	3430	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input checked="" type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):
82.	JACKIE WILLIS	WKYH	City PAINTSVILLE State KENTUCKY	3430	0.0 %	0.0 %	0.0 %	<input checked="" type="checkbox"/> Officer <input type="checkbox"/> Director <input type="checkbox"/> Partner <input type="checkbox"/> Limited Partner <input type="checkbox"/> Owner <input type="checkbox"/> Stockholder <input type="checkbox"/> Attributable Entity <input type="checkbox"/> Other (please specify):

[Newspaper Interests Subform]

(d.) Are any of the individuals listed in response to Question 3(a) married, related as parent-child, or related as siblings?
If "Yes", complete the information describing the relationship.

[Enter Familial Relationships Information]

(e.) Is Respondent seeking an attribution exemption for any officer or director with duties unrelated to the Licensee ?
If "Yes", complete the information in the required fields and submit an Exhibit fully describing that individual's duties and responsibilities, and explaining why that individual should not be attributed an interest.

[Enter Attribution Exemption Information]