COMMENT OF STRATTAN BROADCASTING, INC.

Strattan Broadcasting, Inc. (“SBI”), by its attorneys, hereby submits its comments in response to Public Notice DA 05-1076, released April 14, 2005 relative to Auction 62.

Two of the construction permits proposed to be auctioned are for Farmington Township, Pennsylvania (FM110) and Strattanville, Pennsylvania (FM112). SBI believes that these two allotments, added to the Table of Allotments in 2000, should be removed from the inventory of construction permits to be auctioned. While the reasons justifying removal of these may also apply to other allotments in the inventory, SBI’s comments are limited to these two allotments.

Since the time of the allotment, circumstances in these communities and the surrounding area have changed. According to the Census Bureau, the population of Farmington Township has fallen nearly 2% between 2000 and 2003. The population of Strattanville has fallen nearly 3% in the same period. Since there is a significant Amish
population in Clarion County (in which both communities are located), and Amish do not
use electricity or listen to radio, the actual population whose needs and interests would be
served by a station licensed to either community would be nearly insignificant.
Accordingly, SBI submits that it is an inefficient and wasteful use of the spectrum to
authorize stations serving such a limited population, particularly since there are a number
of other existing stations providing service to the same areas and populations.

In addition to the population decline, Census Bureau data reflect that the economy
of Clarion County is also in decline. The total number of establishments in the county
fell from 1038 in 2000 to 1030 in 2002. Total payroll in those establishments fell by
nearly 8% in that period. While SBI realizes that the FCC does not guarantee the success
of any station, it is a waste of the valuable spectrum to authorize a station whose demise
is all but guaranteed.

By most accounts, the high bids in Auction 37 were far higher than could be
considered reasonable. See, e.g., Radio World, January 5, 2005, p.3. In some cases, the
high bid approached, or even exceeded, the value of an operating station in the same or
same size community. And that is just for the right to file an application for a
construction permit.

While SBI acknowledges that the Commission cannot, under current law, decide
among mutually-exclusive applications other than by competitive bidding, the auction
structure utilized in Auction 37 and proposed to be utilized in Auction 62 inevitably will
lead to the loss of localism. The high bids made in Auction 37, and probably expected in
Auction 62, mean that only multiple owners who can benefit from economies of scale
and spreading of risk will be successful, while small, independent broadcasters who cater to the needs of the locality will ultimately be forced out of business.

A sealed bid auction structure, in which each interested applicant makes its first, last, best and only bid for an allotment would result in more reasonable bid amounts, fewer bid withdrawals and fewer defaults.

SBI believes it is important that spectrum be auctioned, particularly under the current auction structure, only where its use will be efficient. It is not efficient for a channel to be tied up for three or more years in the hope that it will serve a relative handful of potential listeners.

SBI therefore suggests that the allotments for Strattanville and Farmington Township be removed from the inventory of Auction 62 for reallocation in a more efficient manner, or to be auctioned at some future time when the local population has expanded and the local economy has improved.

Respectfully submitted,

STRATTAN BROADCASTING, INC.

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April 29, 2005

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