

August 15, 2022

Chairwoman Rosenworcel
Federal Communications Commission
45 L Street NE
Washington, DC 20554

I would like to add my perspective regarding the substantial increase in broadcaster regulatory fees.

I'm a small market broadcaster. I don't attach any particular virtue to that except to say that budgeting for my company isn't a situation of tapping lines of credit or treasury equity. It is a matter of daily bank balances and paying the bills with checks that I sign, myself.

I'm careful with the company's money. If I wasn't careful, I would have very few opportunities to cut costs without undervaluing the work of our employees or reducing the service we provide to our listeners.

But, it does seem that every time I adjust my expenses to cover the latest client moving to Google's AdWords, another expense takes its place. Last year it was a new expense from GMR for music licensing; the year before it was major adjustments due to Covid protocols and closures. This year, general inflationary pressures have put pressure on my employees, who look to me for salary increases.

This year's proposed increase in regulatory fees is excessive. I had budgeted a modest increase, but this increase is substantial and will have a clear negative impact on my ability to serve our listeners. While I appreciate the breaks we get due to market size, there isn't much spread in the fees between New York and College Station. While NYC pays about 7 times what I pay, their population base is 40 times greater.

I get hit pretty hard by these Regulatory Fees and the amount of increase is unexpected and difficult to account for. I hope the Commission will see its way clear to consider the impact on small, local stations.

Sincerely,

/s/

Ben Downs
Vice President and General Manager
Bryan Broadcasting