

From: longjohn95 [REDACTED] <longjohn95 [REDACTED]>
Sent: Thursday, June 6, 2019 6:41 PM
To: ATR-LitIII-Information (ATR) <ATR.LitIII.Information@ATR.USDOJ.gov>
Subject: ASCAP & BMI Consent Decree review

Hello...

Everytime I hear of a review to "reform" something, I shudder...the result rarely resembles the intention.

There are 2 types of broadcasters...the big fat cat conglomerents, and the small struggling b'casters.

Us small broadcasters struggle with royalty fees, both for OTA (Over The Air) and internet streaming...

LPFM's are required to be a Non Profit as per the LCRA...it costs us the same to equip a station with decent hardware, including FCC type accepted transmission equipment.

We don't have the same financial income the big fat cat b'casters do, and while LPFM's do get a discounted rate for OTA & stream royalties, it's still a burdon.

A burdon for small b'casters does mean a thing to the big fat cat b'casters...they can bully legislation through Congress with a platoon of lawyers, engineers, & consultants, and deep pocked finances...

Small b'casters are thus at an unfair disadvantage in terms of representation before both Congress & the FCC

Historically the big fat cat b'casters have steam-rolled the process on many levels. It's no secret that NAB does not like LPFM b'casters and has openly worked against us.

The big fat cats gerrymander the process...because they have the \$\$\$ to do so.

PROPOSAL: Change the way ASCAP, BMI, & SESAC calculate fees to a PERCENT OF ADJUSTED ANNUAL INCOME FOR NON PROFIT STATIONS...

It might also be worth looking at how other countries structure their royalty fees ...

Thank you