March 17, 2015

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: MB Docket No. 14-226
Licensee-Conducted Contests

Dear Madam Secretary:

I am writing in support of the Commission’s proposal to modernize the Contest Rule. I agree with the comments submitted by other broadcasters. But I have one particular concern regarding the proposed requirement for a station – each time it mentions a contest – to announce the contest terms are available on its website and to identify its complete, direct website address.

My company, Clarke Broadcasting Corporation, is a quintessential small market broadcaster. Our programming focuses on our community, and as part of our engagement with our listeners, we air contests weekly.

For example, KKBN conducts two weekly contests: a pet-of-the-week contest and a hard-working-man contest. KZSQ conducts a weekly working-woman-of-the-week contest. Listeners nominate a pet, a man or a woman, as the case may be, and the station announces a winner weekly. The value of the prize awarded is nominal, other than the considerable pleasure of having, for example, a photo of your pet posted on our website. Yet our on-air hosts and listeners enjoy the contests and “mention” them frequently. A “mention” may be as simple as a reminder that “this week’s pet of the week is coming up at 8:00 a.m.” Or a “mention” may be a discussion of the cuteness of this week’s winning cat.

It would be bad programming to follow each “mention” of one of these contests with an announcement that the contest terms are available on our website, www.kkbn.com. The announcement itself would disrupt the normal programming flow and quickly begin to irritate our listeners, who are very familiar with these long-running contests.

I urge the Commission not to require full disclosure of the availability of contest terms and the website address each time that a contest is mentioned or advertised.

Respectfully submitted,

/s/

H. Randolph Holder