



Community Advisory Board
521 Southridge Road
Delray Beach, FL 33444-2229

Marlene Dortch, Esq., Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

ATTN: Audio Division, License Renewal Processing Team, Mail Stop 1800B

30 January 2011

Petition to Deny

**Re: WXEL Boynton Beach FL
FCC Facility ID 61084
Application file number BALED-20101228AAS**

Dear Secretary Dortch,

The WXEL Community Advisory Board is a group of 10 volunteer members, all of whom reside in the WXEL service area and meet regularly, as required by the Corporation for Public Broadcasting Community Advisory Board Requirements (Exhibit A, III.A.2.c). A list of members and meeting dates for 2010-2011 is attached as Exhibit B to this petition to deny. Exhibit C is a copy of the bylaws of the WXEL Community Advisory Board (WXEL CAB).*

Per Corporation for Public Broadcasting requirements, The WXEL CAB's mission has been to serve as "a vehicle for effective community input to the station's governing body" (Exhibit A, II.B.1). In its pursuit of this mission, the WXEL Community Advisory Board has discovered compelling reasons for the FCC to deny the assignment of the WXEL FM license to Classical South Florida. Grounds for denial fall into two categories:

1. Classical South Florida does not meet the FCC's localism requirements
2. Barry Telecommunications seeks to profit from the transfer of WXEL FM rather than serve the needs and interests of the community

Please consider the following evidence in support of these two conclusions.

* The WXEL CAB became independent of the governing body in January 2010 by electing its own officers and setting its own agenda. Prior to that, since at least 2005, the WXEL CAB had been run by station employees and thus did not comply with Corporation Public Broadcasting requirement II.D., which states that "The composition of the community advisory board must reflect its independent role, and may not include members of the station staff or governing body in anything other than an ex officio or administrative capacity." (Exhibit A)



I. Classical South Florida does not meet the FCC’s localism requirements

The WXEL CAB’s understanding of localism comes from the FCC publication entitled “Broadcasting and Localism: FCC Consumer Facts”, which defines localism as follows:

Broadcast radio and television are distinctly local media. They are licensed to local communities, and *the Federal Communications Commission (FCC) has long required broadcasters to serve the needs and interests of the communities to which they are licensed*. Congress has also required that the FCC assign broadcast stations to communities around the country to assure widespread service, and the Commission has given priority to affording local service as part of this requirement. Broadcast “localism” encompasses these requirements. (Exhibit D, “Broadcasting and Localism: FCC Consumer Facts”; emphasis added)

A. Classical South Florida would not serve the Needs and interests of the community

Acting as a vehicle for effective community input, the WXEL CAB has witnessed WXEL community members express their belief that Classical South Florida would not serve the needs and interests of the community. Objections to the transfer of the WXEL FM license to Classical South Florida have come from three types of community members:

- Groups and individuals
- Government bodies and elected officials

1. Groups and individuals

The WXEL CAB, SOS WXEL, and individual members of the community all participated in discovering and expressing the needs and interests of the WXEL community as follows.

a. WXEL CAB

i. Public forum 1: Community response to Classical South Florida as next licensee

In an effort to determine the needs and interests of the community and to solicit the input of the community regarding the proposed license transfer, the WXEL Community Advisory Board convened a public forum. The forum was held on May 25 from 11:00 to 12:15 in the WXEL community room.

The public forum was announced and covered by the local media. A copy of *The Palm Beach Post*’s story about the forum appears as Exhibit E.

As a result of the input received at the public forum and its own analysis, the WXEL CAB adopted the following official position regarding the proposed license transfer:



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The WXEL Community Advisory Board supports local license holders, operators, managers, and board members for its public radio and TV stations WXEL FM 90.7 and DTV 42. Furthermore, the CAB does not support the splitting of the stations for any purpose. The CAB supports local programming that reflects the diverse needs and interests of the Palm Beach County and Treasure Coast communities.

Classical South Florida, a Florida nonprofit corporation, is a wholly owned subsidiary of American Public Media Group (APMG), a nonprofit organization based in Saint Paul, Minnesota. American Public Media Group is also the parent organization of—but distinct from—American Public Media, the distribution arm of Minnesota Public Radio that produces shows like St. Paul Sunday, Marketplace and Speaking of Faith. Given its child-parent relationship with APMG, Classical South Florida appears to be local in name only. Also, Classical South Florida seeks to acquire the license to the WXEL radio station only and has no plans for WXEL TV. Finally, Classical South Florida broadcasts classical music only.

In addition to community input, the WXEL CAB considered the following factors as part of developing its official position on the proposed license transfer of WXEL FM 90.7 to American Public Media Group subsidiary Classical South Florida.

- APMG borrowed roughly \$20 million from Public Radio Capital, Inc. to purchase its current station, WKCP 89.7 FM in Miami. APMG intends to borrow \$4 million more to acquire the license to WXEL 90.7 FM. The WXEL CAB believes that granting the radio license to an organization carrying so much debt is misguided because it would siphon funds out of our community for years to come and it would effectively squelch the opportunity to produce local programming. Moreover, such a debt would saddle our community's public radio station with a good chance for failure.
- APMG subsidiary Classical South Florida is dedicated to broadcasting classical music only. Its program schedule includes broadcasts of classical programs such as Performance Today, SymphonyCast, Pipedreams, and Saint Paul Sunday. The CAB respects the quality of Classical South Florida's programming. However, an all-classical format comprised of national and Minnesota-related programs does not reflect the diverse needs and interests of the Palm Beach County and Treasure Coast communities.



- Classical South Florida’s Asset Purchase Agreement calls for offering employment to seven WXEL FM employees and for leasing office space at WXEL studios for one year. The CAB believes that splitting the radio station and TV station staff will result in the demise of the TV station because of the current cost-sharing benefit derived from many of the 27 WXEL employees working for both radio and TV. The WXEL CAB also suspects that Classical South Florida’s presence in WXEL studios will end after the one-year lease expires, effectively moving WXEL FM management outside of the WXEL community.

(Excerpted from Exhibit F, WXEL CAB position on the transfer of WXEL FM to Classical South Florida, delivered to Barry Telecommunications June 2, 2010.)

ii. Public forum 2: Local groups seeking WXEL licenses

In the interest of providing solutions-based input to WXEL licensee Barry University, the WXEL CAB held a public forum on local groups seeking the WXEL TV and radio licenses. The purpose of the forum was to give the WXEL community an opportunity to learn about and evaluate two potential successors rooted in the service area. Based on the public’s response and the CAB’s own analysis, the CAB was willing to consider endorsing one of the two groups.

The two local groups seeking the WXEL licenses are the Community Broadcast Foundation and Strategic Broadcast Media. Representatives from each group made a presentation at the public forum held Tuesday, June 29 from 6:30 to 8:00 p.m. at the Boynton Beach City Library located at 208 S. Seacrest Blvd., Boynton Beach, FL 33435.

This public forum, like the one before it, was announced and covered in the local newspapers. See “Competitors vie for WXEL while listeners complain about sale” in the July edition of *The Coastal Star* by Kelly Wolfe (Exhibit G) for example.

At its July 26 meeting, the WXEL CAB moved to endorse the Community Broadcast Foundation as the licensee of WXEL radio and TV. Through a subsequent electronic vote to include members absent from the meeting, the motion was approved.

The WXEL CAB notified Barry of its endorsement of the Community Broadcast Foundation via email delivered to Barry Telecommunications Chair Sr. Linda Bevilacqua on 20 August 2010, stating that “The CAB understands that Barry Telecommunications has accepted Classical South Florida’s offer for WXEL FM, but as you know our board does not support that decision. Should the Florida Board of Education reject the Classical South Florida offer, the CAB believes it is



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important to have identified an independent, local successor.” For full text of the WXEL CAB’s endorsement of the Community Broadcast Foundation, see Exhibit H, email entitled “CAB Endorsement, Requests”.

iii. Rally to save WXEL

In anticipation of the Florida Board of Education meeting in Miami on December 17, during which the Board planned to address the potential transfer of WXEL FM to Classical South Florida, the WXEL called for a rally to save WXEL. Held November 16 at 9:00 a.m. at WXEL in Boynton Beach, the rally included four activities:

- Learning about how the upcoming Board of Education meeting could mean the end of WXEL FM
- Providing input on how the WXEL CAB should represent the community at the BOE meeting
- Signing up for bus transportation to attend the BOE meeting in Miami
- Sharing your favorite WXEL FM stories

Again, community members expressed their opposition to Classical South Florida as the next successor of WXEL FM and asked the WXEL CAB to convey their objections to the Florida Board of Education at their December meeting in Miami.

See Exhibit I, “WXEL’s soul at stake, opponents say, as state board considers sale of public radio station” by Lona O’Connor in *The Palm Beach Post* November 27, 2010.

b. SOS-WXEL

SOS-WXEL is a grassroots organization formed to protest the potential sale of WXEL FM to Classical South Florida. James Roth and Robert Brown, co-founders of the organization, are both long-time community members.

SOS-WXEL held public demonstrations, spoke at Barry Telecommunications’ annual meeting in September 2010, and collected signatures on a petition requesting that Barry transfer WXEL radio and TV to the Community Broadcast Foundation. SOS-WXEL co-founder James Roth also addressed the Florida Board of Education at its December 17 meeting in Miami when the WXEL FM license transfer was on its agenda. (Exhibit J)

c. Individuals

Individuals from the WXEL community expressed their opposition to Classical South Florida as a successor to WXEL FM by attending public forums, signing petitions, writing letters to the editors of the local papers, and writing letters of objection to the Florida Board of Education and the FCC.



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Examples of letters from residents of the community are available upon request.

In an effort to help the Board of Education make an informed decision at their December meeting in Miami, the CAB created a petition online requesting that the Board reject Barry's request to transfer the license of WXEL FM 90.7 to Classical South Florida. The CAB invited community members to sign; 81 people added their name to the petition. A list of signatories and petition text are attached as Exhibit K. (Note: Closed to signatures on December 18, the petition remains online at <http://www.change.org/petitions/view/wxel - save our stations>)

SOS-WXEL also collected signatures on a petition, gathering 100 signatures prior to the December 17 Board of Education meeting. (Exhibit L)

2. Government bodies and elected officials

A variety of government bodies and elected officials wrote to the Florida Board of Education to express their concern regarding Barry's request to transfer WXEL FM 90.7 to Classical South Florida, including the following:

- The Palm Beach County Commission
- The City of Boynton Beach
- Representative Joseph Abruzzo
- Representative Maria Sachs
- Representative Mack Bernard
- Representative Kelly Skidmore

Boynton Beach Mayor Jose Rodriguez wrote, "The City is concerned that the pending sale will result in a loss of a local voice heard throughout a five county area of Florida without any comparable replacement." (Note: Classical South Florida, the prospective buyer, has no on-air personalities in Florida; all Classical South Florida radio commentators live and work in Minnesota.)

The City of Boynton Beach is also concerned that the WXEL studios, deeded by the City for the purpose of a "non-profit educational and/or public broadcasting or communications system," may be transformed to a purpose not intended by past and current City leaders. (Note: Classical South Florida currently broadcasts classical music only.)

The Palm Beach County Commission wrote to the State Board of Education expressing concern that the radio station might be sold to what appears to be to a Minnesota company and the potential loss of WXEL as a resource for local issues. (Note: A minority of Classical South Florida board members live in the WXEL service area. If approved, the sale would result in the change of WXEL FM's call letters.)

In their letters to the Board, all elected officials expressed concern about the separation of WXEL radio and TV. "Classical South Florida seeks to acquire the license to the WXEL



radio station only and has no plans for WXEL TV,” wrote Representative Bernard. “WXEL TV and radio should not be split for any reason,” he continued. “Doing so puts the TV operation and many jobs in jeopardy.” (Note: WXEL TV and radio combined currently employ nearly 30 employees full-time. Classical South Florida has committed to offering employment to just 7 full-time employees for one year.)

See Exhibit M for copies of letters of government bodies and elected officials written to the Board of Education regarding the proposed transfer of WXEL FM.

In sum, the WXEL community has spoken clearly and frequently regarding its own needs and interests. Individual citizens, groups, government bodies, and elected officials have all expressed their opposition to Classical South Florida as the successor to WXEL FM, consistently stating that the community’s public broadcasting needs and interests would not be well served by Classical South Florida. This is the first reason that Classical South Florida does not meet the FCC’s localism requirements.

B. Classical South Florida’s main studio is outside the community of WXEL’s license

The FCC document entitled “Broadcasting and Localism: FCC Consumer Facts” further states that “The FCC also requires that each broadcast station keep its main studio in or near its community of license and that calls from citizens in the community to the station be toll-free.” (Exhibit D)

It is the WXEL CAB’s understanding that Classical South Florida’s main studio is in Minnesota and that Classical South Florida has no on-air personalities in Florida – all Classical South Florida radio commentators live and work in Minnesota. Obviously, phone calls from citizens in the WXEL community to a studio in Minnesota are not toll-free.

Furthermore, Classical South Florida’s main management office is in Ft. Lauderdale, a city that is not part of the WXEL service area as defined by the FCC. In fact, Ft. Lauderdale is in another county. As a result, even phone calls from citizens in the WXEL community to Classical South Florida offices in Ft. Lauderdale are not toll-free.

While Classical South Florida’s Asset Purchase Agreement with Barry would require Classical South Florida to rent space in the WXEL studios in Boynton Beach for one year, the contract does not require Classical South Florida to broadcast from the WXEL studios. The WXEL CAB believes that the one-year sublease is designed to give Classical South Florida a token presence in the WXEL community for one year, after which it would not renew its lease. After all, Classical South Florida’s current arrangement with parent American Public Media Group in Minnesota to broadcast music produced in Minnesota to south Florida results in essential cost savings to Classical South Florida. Given that Classical South Florida is already \$20 million in debt, the WXEL CAB believes that Classical South Florida cannot afford to sacrifice a major cost-saving measure like broadcasting music produced in Minnesota.



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Having its main studio quite distant from the community of license of WXEL FM is the second reason that Classical South Florida does not meet the FCC's localism requirements.

II. Barry Telecommunications seeks to profit from the transfer of WXEL FM rather than serve the needs and interests of the community

This attempt by Barry Telecommunications is the latest in a string of attempts by the governing body to divest itself of WXEL radio and TV for its own benefit and at the expense of the community.

A. Barry has not been able to transfer the licenses in more than 6 years, despite the continued interest of at least one qualified local group

Barry first announced its intent to divest itself of the WXEL licenses in July of 2004, receiving five bids several months later. Barry has been unable to transfer the WXEL licenses in six years. Apparently, this is the longest attempt to transfer licenses in the history of public broadcasting. The WXEL CAB believes that Barry has unnecessarily prolonged the license transfer process by seeking to profit on the transfer of the WXEL licenses rather than serve the needs and interests of the community.

As evidence of Barry's profit motive, consider that Barry has consistently pursued inappropriate successors to the WXEL licenses. WNET in New York, WPBT in Miami, and the School Board of Palm Beach County have all met with Barry to discuss a license transfer. WNET, with Barry's blessing, went so far as to apply for both WXEL licenses, an application that the FCC correctly ignored.

According to FCC licensee criteria, none of the entities Barry has met with is an appropriate candidate. Meanwhile, Barry University administrative staff and its attorneys have continually refused to meet with members of the Community Broadcast Foundation, the one local candidate that appears prepared to rebuild the stations to a new level of service and prominence in the community.

Indeed, the WXEL CAB believes that the best solution for serving the needs and interests of our community is for Barry to transfer the licenses to the non-profit 501(c)(3) Community Broadcast Foundation, a group of broadcasting, fundraising, and management professionals, all of whom live in our community. As noted above (I.A.1.a.ii), the WXEL CAB endorsed the Community Broadcast Foundation to Barry in the event that the Classical South Florida's attempt to acquire the WXEL FM license should fail (Exhibit H).

Barry has ignored the Community Broadcast Foundation's good-faith and legitimate efforts to acquire the licenses. In November of 2004, the CBF responded to Barry's request for proposals with a formal submission. (Due to length considerations, copy of the Community



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Broadcast Foundation's submission is not included here; however, a copy is available upon request). The Community Broadcast Foundation's proposal was not acknowledged. Then in June of 2008, the Community Broadcast Foundation delivered a letter of intent to Barry, offering up to \$5 million as part of transaction to acquire the stations (copy available upon request). This letter also went unacknowledged. In September 2009 after the Palm Beach County School Board abandoned its attempt to acquire the licenses, the Community Broadcast Foundation responded to Barry's new request for proposals by letter, stating that its last offer remained in force (copy available upon request). As of this writing, the CBF's most recent letter has received no response.

Barry's failure to transfer the licenses over the last six years has led to significant losses: a loss of local programming, a loss of human resources, and a loss of funding opportunities.

Since Barry initiated the search for a new WXEL trustee in 2004, WXEL FM and TV staff has gone from 55 fulltime employees to less than 30. In the summer of 2009, the TV station was forced to cancel its signature local news program South Florida Today, its only local program being aired at the time, essentially reducing WXEL FM to a repeater of national programming. As of this writing, no local news program has replaced South Florida Today.

During Barry's protracted search for a trustee, a perception of instability has grown up around WXEL radio and TV. As a result, contributors of major gifts to the stations have chosen not to repeat their gifts, unsure that a local entity will acquire the station licenses, wondering if the stations can even remain operating. Every day the stations' future remains unresolved results in lost funding opportunities. During its tenure as trustee, Barry has never become involved in the stations' fundraising efforts.

The WXEL community can ill afford to have the stations in limbo any longer with regard to a new owner. If this damaging trend continues, we could lose the stations soon. Barry's pursuit of profit over the needs and interests of the community is irresponsible.

The WXEL CAB has shared with Barry its concerns about Barry's strategy for transferring the WXEL licenses. The WXEL CAB was granted permission to speak at Barry Telecommunications' annual meeting on September 23, 2010. The meeting was held at the WXEL studios.

At the meeting, I told the Barry board that the WXEL CAB had made three findings, developed concerns, and drawn some conclusions. A summary of my remarks follows.

Findings

1. As the result of a public forum held in May in the WXEL community room, we found that there is no public support for the transfer of WXEL FM to Classical South Florida.



2. In the event that the proposed sale is rejected by the Board of Education and the FCC, the CAB believes it is important to have identified a potential independent local successor who could step in and take over.
3. The CAB believes that a local group, the Community Broadcast Foundation of Palm Beach and the Treasure Coast, is qualified to become the next license holder of WXEL TV and radio should the Classical South Florida agreement fail.

Concerns

(These are addressed in section II.C. of this petition.)

Conclusions & recommendations

1. This is apparently the longest attempt to transfer licenses in the history of public broadcasting.
2. This suggests to the CAB that Barry’s strategy for transferring the licenses is flawed.
3. It is difficult to advise somebody on an important decision after they have made the decision. We invite the Barry Telecommunications board to solicit the input of the CAB before seeking new licensees in the future.

The full text of remarks I made at the Barry Telecommunications 2010 annual meeting is attached as Exhibit N.

B. Barry has made unsubstantiated and illegitimate claims about its financial involvement with the stations, refusing to respond to request

In a letter from its legal counsel to the Florida Department of Education, Barry made several unsubstantiated and apparently illegitimate claims regarding its financial involvement with WXEL, as follows:

- Initial Cash Contribution (October 1997 and May 1998) \$1,821,683
- Time Value of Money on Initial Contribution \$1,721,329
(12 years @ 5.70% -- 10 year treasury bond rates -- Avg. of 10/97 and 05/98)
- Avg. FY2010 Intercompany Note Payable -- Barry Tel to Barry U. \$1,780,000
- Total Hard Dollar Contributions \$5,323,012

(See Exhibit O, letter from Holland & Knight to Florida Department of Education, Commissioner Eric Smith)

In response to these claims, the Florida Department of Education expressed the following concerns and doubts:

1. “While the licenses are in the name of Barry University’s subsidiary, the Department is concerned that the broadcasting licenses are a public asset. Therefore, we have questions about Barry University’s ability to sell these licenses in general, and use the proceeds for its private interests. When Barry University took over WXEL, it was not sold. According to our records, there was a merger at no cost other than taking over the operating obligations.”



2. “Moreover, since Barry University is a private institution the Department is also concerned with it profiting on the sale of a public asset. The State of Florida has expended far more money than Barry University to operate WXEL, yet Barry University is taking the position that it should retain all sales proceeds even if it means receiving millions more than it has paid to operate the radio station.”
3. “The Department also believes it is in the public interest to keep the radio and TV licenses in the control of one entity. This issue is exacerbated when the radio license is taken over by an out-of-state public broadcaster, rather than transferring both licenses to a local community-backed organization.”
4. “. . . the Department is looking for more details concerning the costs incurred by Barry University, as noted in your letters and supporting documentation. Specifically, we would like copies of the underlying loan documentation and the payment history of the loan. If this documentation demonstrates that the loan has been paid back to Barry University then I do not believe it should be listed as an expense.”
5. “In your letter, you also listed over \$1.7 million dollars in expenses, which is the amount Barry University claimed it could have earned if it did not pay expenses of WXEL. The lost investment value of any contributions to WXEL does not appear to us to be a legitimate expense.”
6. “Barry University also lists over \$1.8 as an “Initial Cash Contribution.” The Department would like to see documentation supporting the actual expenditure of such funds. In addition we would need verification that the contribution was never paid back.”

(Excerpted from Exhibit P, letter from Florida Department of Education Deputy General Counsel Steven Ferst to Holland & Knight.)

Barry did not respond to these concerns and doubts, so the WXEL CAB submitted its own request for additional information about these claims on November 4 via email to Barry Telecommunications Chair Sr. Linda Bevilacqua (Exhibit Q), requesting a response by November 12. We never received a response.

C. Barry has not involved the WXEL community or its own Community Advisory Board in its search for a successor to the WXEL licenses

Throughout the six years of its attempt to transfer the WXEL licenses, Barry has never once solicited advice from its Community Advisory Board. Not only has Barry not involved the WXEL CAB in its search for a new successor, it has in fact discouraged the WXEL CAB from pursuing its mission to act as a “vehicle for effective community input”.

In a letter to me dated 22 June 2010, Sr. Linda Bevilacqua stated that the WXEL CAB had “no right or authority” to hold a meeting to present potential successors to the WXEL community (see Exhibit R), referring to an upcoming WXEL CAB public forum. She further stated that the purpose of our public forum was “for choosing an organization to purchase the



Stations” though the WXEL never advertised the forum as anything other than an opportunity for the WXEL community “to learn about and evaluate the two local groups seeking to acquire the WXEL licenses”, adding that the WXEL CAB could potentially endorse one of the two local groups after the forum. In her letter, Sr. Linda implied that the WXEL CAB’s endorsement of a group other than Classical South Florida “would not be consistent with federal law and would interfere with Barry Telecommunications’ contractual relations.”

The WXEL CAB responded as follows:

With regard to the public forum we plan to hold, our intent is not, as you suggest, “for the purpose of choosing an organization to purchase the stations.” Rather, the CAB is holding the forum to give the WXEL community the opportunity to learn about and evaluate the two local groups seeking to acquire the WXEL licenses. Depending on the public’s response to the groups and the CAB’s own analysis, the CAB could potentially endorse one of the two groups as a way of advising Barry on this major decision.

The CAB believes that an endorsement is well within the bounds of advice. Newspapers endorse candidates for public office all the time. No one would suggest that in doing so they are “choosing” a candidate for office; they are simply offering advice, the same as the CAB would be doing if it decides to offer an endorsement. By the same token, the CAB understands that Barry Telecommunications and/or Barry University exercise full control over the daily management and operations of the stations, including the decision to transfer the licenses and to select the potential successors. The CAB also understands that Barry has no obligation to heed the CAB’s advice. Nevertheless, we are duty-bound to give it, and you are obligated to receive it.

It is difficult to give advice after the fact. The CAB would have preferred to advise Barry about Classical South Florida before that group was chosen to be the successor, but we were not given a chance.

Excerpted from Exhibit S, letter from WXEL CAB to Sr. Linda Bevilacqua, 29 July 2010.

As should be clear, by not pursuing appropriate successors, by ignoring and discouraging its own advisory board, and by making unsubstantiated and illegitimate financial claims, Barry seeks to profit on the transfer of the WXEL license, a community resource entrusted to it as an asset to serve the community, not its own finances. This is the second reason to deny the transfer of WXEL FM to Barry’s chosen successor, Classical South Florida.

In conclusion, the FCC should deny Barry Telecommunications’ application to transfer the license of WXEL FM to Classical South Florida for the two reasons stated at the outset of this petition:

1. Classical South Florida does not meet the FCC’s localism requirements



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2. Barry Telecommunications seeks to profit from the transfer of WXEL FM rather than serve the needs and interests of the community

Furthermore, the WXEL CAB respectfully requests that the FCC hold a hearing in the community of license to be fully aware of all the facts related to this application. Thank you for time and attention to this important matter. We look forward to hearing from you.

Sincerely,

Pablo del Real
WXEL Community Advisory Board
Chair 2010-2011