

Adherence to Minimum Operating Schedule

Since Richard J. Samson, as Receiver, became the licensee of KOBBS-FM, Bozeman, Montana (Facility ID No. 16776) (“KOBBS-FM”), on December 6, 2019,¹ KOBBS-FM was silent for two (2) periods exceeding 30 consecutive days: (1) December 6, 2019 to April 11, 2020; and (2) April 27, 2020 to the present.

KOBBS-FM has had a history of struggling to remain on the air due to financial issues originating under its former licensee, Reier Broadcasting Company, Inc. (“Reier Broadcasting”), which resulted in Reier Broadcasting entering Mr. Samson’s receivership following the death of Reier Broadcasting’s sole shareholder and President, William R. Reier, on September 2, 2019.² Mr. Samson was named Receiver of the Reier Broadcasting assets in an order dated October 25, 2019 issued by the Montana Eighteenth Judicial District Court.³ On November 12, 2019, an application for the involuntary assignment of KOBBS-FM’s license from Reier Broadcasting to Mr. Samson, was filed with the Commission.⁴ That application was granted and consummated on December 6, 2019.⁵ Mr. Samson’s primary duty as Receiver of Reier Broadcasting is to find a buyer for Reier Broadcasting’s stations, including KOBBS-FM, which, as further detailed below, has now been accomplished.

KOBBS-FM’s Periods of Silence Under Reier Broadcasting Company, Inc.

1st Period of Silence (June 1, 2018 – May 18, 2019). On June 1, 2018, KOBBS-FM went silent due to financial difficulties of its former licensee, Reier Broadcasting.⁶ On June 12, 2018, Reier Broadcasting filed a Notification of Suspension of Operations/ Request for Silent Special Temporary Authority (“STA”) for KOBBS-FM, which was granted August 17, 2018.⁷ Due to continuing financial difficulties, Reier Broadcasting then filed a Request for Extension of Silent STA for KOBBS-FM, which was granted March 25, 2019.⁸ KOBBS-FM resumed operations on May 18, 2019 with its licensed facilities.⁹

¹ See File No. BAL-20191112ABB.

² *Id.*

³ *Id.*

⁴ *Id.*

⁵ *Id.*

⁶ See File No. BLSTA-20180612AAM.

⁷ *Id.*; Letter from Lisa Scanlan, Deputy Chief, Audio Division, Media Bureau, FCC, to Matthew H. McCormick, Esq., Counsel for Reier Broadcasting Company, Inc. (1800B3-DW) (Aug. 17, 2018).

⁸ File No. BLESTA-20190206ABE; Letter from Lisa Scanlan, Deputy Chief, Audio Division, Media Bureau, FCC, to Matthew H. McCormick, Esq., Counsel for Reier Broadcasting Company, Inc. (1800B3-KC) (Mar. 25, 2019).

⁹ Resumption of Operations Notification (KOBBS-FM) (filed May 21, 2019).

FCC Form 2100 – Schedule 303-S
Adherence to Minimum Operating Schedule Exhibit

2nd Period of Silence (May 27, 2019 – December 6, 2019). KOBBS-FM again went silent on May 27, 2019 due to Reier Broadcasting's continuing financial difficulties.¹⁰ On June 5, 2019, Reier Broadcasting filed Notification of Suspension of Operations/ Request for Silent STA for KOBBS-FM, which was granted June 27, 2019.¹¹ KOBBS-FM remained silent until Mr. Samson, its current licensee, acquired control of the station on December 6, 2019.¹²

KOBBS-FM's Periods of Silence Under Richard J. Samson, as Receiver

1st Period of Silence (December 6, 2019 – April 11, 2020). KOBBS-FM was silent when Mr. Samson acquired control of the station on December 6, 2019.¹³ Due to KOBBS-FM's continuing financial difficulties, Mr. Samson filed a Request for Extension of Silent STA for KOBBS-FM, which was granted January 27, 2020.¹⁴ KOBBS-FM resumed operations on April 11, 2020, with reduced power.¹⁵

2nd Period of Silence (April 27, 2020 – Present). KOBBS-FM again went silent on April 27, 2020 due to Mr. Samson's financial difficulties in operating the station.¹⁶ On May 26, 2020, Mr. Samson filed a Notification of Suspension of Operations/ Request for Silent STA for KOBBS-FM, noting that he was actively pursuing the sale of KOBBS-FM pursuant to his duties as Receiver of Reier Broadcasting.¹⁷ The STA Request was granted on July 15, 2020.¹⁸

Mr. Samson has now identified a buyer for KOBBS-FM, and on November 9, 2020, an application to assign KOBBS-FM's license to SW Montana Media, LLC was filed with the Commission.¹⁹

¹⁰ See File No. BLSTA-20190605ACE.

¹¹ *Id.*; Letter from Lisa Scanlan, Deputy Chief, Audio Division, Media Bureau, FCC, to Matthew H. McCormick, Esq., Counsel for Reier Broadcasting Company, Inc. (1800B3-MAT) (June 27, 2019).

¹² See File No. BAL-20191112ABB.

¹³ See *id.*

¹⁴ File No. BLESTA-20191218AAL; Letter from Victoria McCauley, Attorney, Audio Division, Media Bureau, FCC, to Matthew H. McCormick, Esq., Counsel for Richard J. Samson, as Receiver (1800B3-DW) (Jan. 27, 2020).

¹⁵ Resumption of Operations Notification (KOBBS-FM) (filed April 16, 2020). See also File No. BSTA-20200414AAB (granted April 16, 2020).

¹⁶ See File No. BLSTA-20200526AAG.

¹⁷ See *id.*

¹⁸ Letter from Victoria McCauley, Attorney, Audio Division, Media Bureau, FCC, to Matthew H. McCormick, Esq., Counsel for Richard J. Samson, as Receiver (1800B3-DW) (July 15, 2020).

¹⁹ See File No. BAL-20201109AAV.