

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	KGTW(FM), Ketchikan, AK, <i>et al.</i>
	)	Facility ID No. 789
	)	
Frontier Media, LLC	)	KINY(AM), Juneau, AK, <i>et al.</i>
	)	Facility ID No. 823
	)	
Petition for Declaratory Ruling Under	)	KCMC-AM, Texarkana, TX, <i>et al.</i>
Section 310(b)(4) of the Communications Act	)	Facility ID No. 33542
of 1934, as Amended	)	
	)	KTOY(FM), Texarkana, AR
	)	Facility ID No. 31348
TO: Secretary, FCC		
FOR: Chief, Media Bureau		

**PETITION FOR DECLARATORY RULING OF FRONTIER MEDIA, LLC  
UNDER SECTION 310(b)(4) OF THE COMMUNICATIONS ACT OF 1934, AS AMENDED<sup>1</sup>**

On behalf of Frontier Media, LLC (“Petitioner”), and pursuant to the Commission’s Declaratory Ruling in MB Docket No. 13-50, released November 14, 2013 (28 FCC Rcd 16244), we hereby petition the Commission for a Declaratory Ruling permitting Petitioner’s Australian principals, Richard and Sharon Burns (who are husband and wife), to increase their ownership in the radio stations at issue from a combined 20% to 100% under Section 310(b)(4) of the Communications Act of 1934, as amended (the “Act”).<sup>2</sup>

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<sup>1</sup> This Petition is being filed both separately with the Secretary’s Office and also as an exhibit to each of the captioned applications for transfer of control.

<sup>2</sup> The stations at issue are shown in Exhibit 1.

As set forth in more detail below, grant of this petition would serve the public interest in numerous ways:

1) Frontier principal Richard Burns, an Australian citizen, has lived in Alaska and managed the Alaska radio stations since 2006;

2) Mr. Burns and his wife, Sharon, who is also an Australian citizen, have held minority ownership interests in the Alaska stations since May 2011 (FCC File No. BTC-20111130EWM) and minority ownership interests in the Texarkana radio stations since March 2013 (FCC File No. BALH-20121121ABR);

3) The long-time 80% owner of these stations intends to retire and sell them in order to fund his retirement with the proceeds and provide an inheritance for his son and grandchildren, and there are no other potential buyers reasonably identifiable;

4) Australian ownership poses no national security or other threat to the United States. Indeed, Australia is one of our most steadfast allies and shares many of our cultural traditions;

5) Grant of this request would further the public interest goal of promoting broadcast service to Alaska, which is a generally underserved area, and to the small communities of Texarkana Texas/Arkansas, Hope, Arkansas, and New Boston, Texas;

6) The requested Australian ownership would consist only of Richard and Sharon Burns, who are husband and wife. There will be no other ownership interests or investors, either attributable or unattributable;

7) As long-time residents of Juneau, Alaska, the Burns are both known and respected members of the community, with Richard Burns having been honored by the Juneau Chamber of Commerce as Juneau "Citizen of the Year" in 2010, recognizing his contributions to the Juneau community in connection with his management of the radio stations there; and

8) Grant of this request would further the Commission's goals of encouraging foreign investment and ownership diversity in U.S. broadcast stations as described in the 2013 Declaratory Ruling, and affirmed in the Commission's Notice of Proposed Rulemaking in GN Docket No. 15-236, released October 22, 2015 (30 FCC Rcd 11830).

## **I. BACKGROUND**

Richard Burns began his broadcasting career in his native Australia in 1980.<sup>3</sup> He was originally an on-air personality for a number of years, progressing up the ranks to Program Director, Production Director and finally, General Manager at the age of 28. After managing several clusters of stations in the early 1990s, in 1996 Mr. Burns became the Group General Manager ("GM") for Broadcasters Australia Limited, the largest commercial radio group in Australia at that time, consisting of 39 stations throughout Australia.

After Broadcasters Australia Limited was sold in 1998, the parent company engaged Mr. Burns to identify acquisition targets and, with a joint venture partner, formed Star Broadcasting Network Brisbane Australia, for which he served as CEO. As CEO, he grew the asset value of the company from \$8.6 million AUD to an estimated \$38 million AUD (approx. \$28 million USD) by improving signal coverage and utilizing Internet programming to increase profitability. During his time at Broadcasters Australia Limited and Star Broadcasting Network, Mr. Burns launched 18 new FM stations as well as a joint venture for national sales.

In 2004, Mr. Burns formed his own media consulting company called Media Results International. The company provided consulting advice to radio stations in the United States, Australia and South Africa. While involved in this consulting business, Mr. Burns met Roy Paschal, the principal of Alaska Broadcast Communications, Inc. ("ABC"). ABC owned six

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<sup>3</sup> The resume of Richard Burns is attached as Exhibit 2.

radio stations and three FM translators throughout Southeast Alaska. Two years later, Mr. Paschal asked Mr. Burns if he would be interested in moving to Alaska and managing these stations as Chief Executive Officer, which Mr. Burns agreed to do in 2006.

Richard Burns and his wife, Sharon Burns, both Australian citizens, moved to Juneau, Alaska in 2006 for the purpose of managing the radio stations owned by Mr. Paschal.<sup>4</sup> Upon accepting this position, ABC applied for and obtained the E3 visa (a specialty occupation visa only for Australian citizens) for Mr. and Mrs. Burns, which they currently have, allowing them to live and work in the United States.

In 2008, Juneau Alaska Communications, LLC (“JAC”) was established and purchased two additional stations in Juneau, Alaska. In 2011, JAC purchased a third station in Juneau. In 2011, Richard and Sharon Burns accepted offers for each of them to purchase a 10% interest in the Alaska stations.<sup>5</sup>

In late 2012, Richard Burns identified an opportunity to purchase five more radio stations and several FM translators in the Texarkana, TX/AR market, along with a separate transaction to purchase a silent station authorized pursuant to Special Temporary Authority (“STA”). Applications to acquire these stations were filed in November 2012 and closings were held in

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<sup>4</sup> Roy Paschal owns Media Ltd., which was then the 100% owner of Alaska Broadcast Communications, Inc. (“ABC”); and he and his son Jason Paschal each owned 50% of Juneau Alaska Communications, Inc. (“JAC”).

<sup>5</sup> Specifically, Richard and Sharon Burns each acquired a 10% ownership interest in ABC and in JAC (i.e. 20% total interest). Only the JAC transaction required the filing of a short-form transfer of control application on FCC Form 316 because prior to that transaction, Roy and Jason Paschal each had negative control of JAC. The 20% reduction of Media Ltd.’s ownership of ABC from 100% to 80% did not require the filing of any FCC application.

March and April 2013.<sup>6</sup> Shortly after closing, the silent station (KTTY-FM) was restored to on-air operation, returning service to the community of New Boston, Texas. As with the Alaska stations, Mr. and Mrs. Burns are each 10% owners of the Texarkana stations as well (i.e. the two of them have a total 20% ownership interest, which represents the current amount of foreign ownership).<sup>7</sup>

Mr. Paschal has recently decided to sell his share of the broadcast stations and there is no more logical person or persons to buy them than the Burns, since Richard Burns is the CEO of these stations and since Richard and Sharon Burns are both current part owners of the stations. Also, as explained below, finding any other *bona fide* purchasers for these stations would be difficult at best.

## **II. Grant of This Petition Would Serve the Public Interest**

The purpose of this petition is to request FCC authorization for Richard and Sharon Burns, who are each 10% owners of the stations at issue, to increase their ownership percentage to 50% each, which would thereby increase the foreign (Australian) ownership of these stations to 100%. They have owned their 20% joint ownership in the Alaska radio stations since 2011 and in the Texarkana stations since 2013. Richard Burns has managed the Alaska stations as CEO since 2006 and the Texarkana stations since 2013. Both Richard and Sharon Burns have lived in Alaska since 2006.

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<sup>6</sup> See FCC File Nos. BALH-20121121ABR, BALH-20121121ABT, BAL-20121121ABS, BAL-20121121ABU, BTCH-20121121ABO and BALFT-20121121ABZ.

<sup>7</sup> The current ownership structure of the various entities is shown in Exhibits 3 (ABC), 4 (JAC), 5 (Texarkana Radio Center Licenses, LLC) and 6 (Jo-Al Broadcasting, Inc.).

In October 2010, Richard Burns was named “Citizen of the Year” by the Juneau (Alaska) Chamber of Commerce, based on his community efforts as CEO of ABC and JAC.<sup>8</sup> Richard Burns is also past president of Juneau Glacier Valley Rotary Club. He has been serving on the boards of the Juneau Chamber of Commerce since 2015 and the Juneau Convention and Visitors Bureau since 2008. Sharon Burns served on the Juneau Chamber of Commerce Board for six years. It is clear that, while neither Richard nor Sharon Burns are US citizens as of yet, they have been model residents of the Juneau, Alaska area for the past ten years.<sup>9</sup> Beyond what Mr. Burns has done as CEO and as a resident of Juneau, he has ensured that Alaska remains well served with radio service.<sup>10</sup>

In allowing for petitions such as this, the Commission noted that the Communications Act’s foreign ownership restrictions “were originally conceived to address homeland security interests during wartime.”<sup>11</sup> It is obvious that allowing two Australian citizens who have not only been residents of the United States for the past ten years, but model residents who have been involved in the US radio business, to increase their ownership percentage beyond the 25% benchmark specified in Section 310(b)(4) of the Act, would not implicate any homeland security concerns. Indeed, grant of this Petition would further the public interest in both strengthening the

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<sup>8</sup> See Exhibit 7.

<sup>9</sup> Both Richard and Sharon Burns would like to apply for US citizenship, but that is not an option currently available to them under the terms their E3 visa. If the Commission grants this petition, they would be able to apply for a class of visa that could potentially lead to citizenship.

<sup>10</sup> The Commission has long recognized the special needs of Alaska’s geography and population in providing favored treatment for the purpose of insuring TV and radio service to the state’s residents. *See, e.g., Wrangell Radio Group*, 75 FCC 2d 404 (1980); *Amendment of Part 74*, 5 FCC Rcd 7212 (1990).

<sup>11</sup> Declaratory Ruling in MB Docket No. 13-50, 28 FCC Rcd 16244 ¶ 2 (2013).

broadcast industry, particularly within Alaska where broadcasting service is desperately needed, as well as in increasing ownership diversity, both of which have been touted as goals of the new policy allowing increased foreign ownership.

Attached to this petition are letters from Alaska State Representative Cathy Munoz,<sup>12</sup> the Juneau Chamber of Commerce<sup>13</sup> and the Juneau Convention and Visitors Bureau<sup>14</sup> attesting to Mr. Burns' character. Also attached are letters from the Mayor of New Boston, Texas,<sup>15</sup> Bowie (Texas) County Judge James M. Carlow<sup>16</sup> and the former President/CEO of the Texarkana Chamber of Commerce,<sup>17</sup> noting both the public interest significance of returning formerly silent station KTTY in New Boston, Texas, to on-air status and Mr. Burns' exemplary operation of the Texarkana stations generally.

Grant of this petition would also serve the public interest in allowing the transfer of ownership of these stations to the Burns, who are likely the only *bona fide* potential purchasers of these stations. The Southeast Alaska stations are located in the small communities of Juneau, Ketchikan and Sitka, Alaska, which are not even large enough to be considered part of a radio market. The Juneau, Alaska DMA has a total of only 28,000 persons.<sup>18</sup> The Texarkana radio

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<sup>12</sup> Exhibit 8.

<sup>13</sup> Exhibit 9.

<sup>14</sup> Exhibit 10.

<sup>15</sup> Exhibit 11.

<sup>16</sup> Exhibit 12.

<sup>17</sup> Exhibit 13. Jeff Sandford, who was the former President and CEO of the Texarkana Chamber of Commerce, now holds those same positions with the Gaston (NC) Regional Chamber of Commerce.

<sup>18</sup> Nielsen Radio Market Survey Population Rankings and Information, Fall 2015.



market is a very small radio market, ranked number 253 in size, with only 115,000 total persons.<sup>19</sup> The likelihood of finding another qualified purchaser for stations in either of these small markets is slim, and the likelihood of finding another qualified purchaser for radio stations in *both* markets is close to, if not, zero.

Additionally, because Mr. Burns has been managing U.S. radio stations for ten years, he is thoroughly familiar with FCC rules and operating procedures. In summary, he is not only well qualified for the job of owning these stations, but likely the only person who would consider doing so.

### **III. Conclusion**

The Commission recognized in its 2013 *Declaratory Ruling* that it was time to begin considering increased foreign ownership of U.S. broadcast stations on a case-by-case basis prior to considering comprehensive rule changes and procedures, such as those proposed in the *Notice of Proposed Rulemaking* released last October.<sup>20</sup> This case presents a perfect opportunity for the Commission to act on such a proposal, allowing existing Australian ownership to increase from 20% to 100%. There are no national security threats involved since the Australians at issue are a married couple who have been partial owners of these stations for a few years now, and since both of them have been living as model citizens in Juneau for ten years.

Additionally, Richard Burns has been managing the Alaska radio stations for ten years and the Texarkana stations for three years and has become intimately familiar with FCC rules. And perhaps most importantly, the public interest is served by allowing existing owner Roy Paschal to transfer his ownership interest in these stations to the only feasible party who

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<sup>19</sup> *Id.*




would likely be interested in acquiring it, thereby allowing the continued operation of stations serving small communities and markets in both Alaska and Texarkana.

Finally, as required by the Communications Act and the Commission, we hereby certify that the proposed foreign ownership of these stations would be indirect ownership in full compliance with Section 310(b)(4) of the Act. Of course, we would be happy to comply with any additional requests for information or documents in support of this petition.

Respectfully submitted,

**FRONTIER MEDIA, LLC**

By:

  
David M. Silverman

**DAVIS WRIGHT TREMAINE LLP**  
1919 Pennsylvania Ave., N.W.  
Suite 800  
Washington, D.C. 20006-3401  
(202) 973-4200

Its Attorneys

June 3, 2016

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<sup>20</sup> *Notice of Proposed Rulemaking* in GN Docket No. 15-236, 30 FCC Rcd 11830 (2015).

**DECLARATION OF RICHARD J. BURNS**

I, Richard J. Burns, hereby declare as follows:

1) I am a principal and 50% owner of Frontier Media, LLC (the proposed Buyer in this transaction). My wife, Sharon Burns, is the other 50% owner of Frontier Media, LLC.

2) I am the Chief Executive Officer and 10% owner of Alaska Broadcast Communications, Inc. ("ABC"), which is the FCC licensee of six radio stations and four FM translators located in Alaska.

3) I am also a member and 10% owner of Juneau Alaska Communications, LLC ("JAC"), which is the FCC licensee of three radio stations, one low power television station and six FM translators located in Alaska.

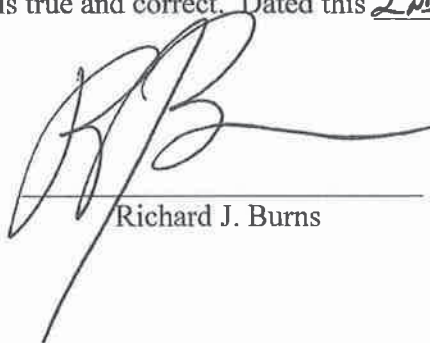
4) I am also a member and 10% owner of Texarkana Radio Center, LLC, which is the 100% owner of Texarkana Radio Center Licenses, LLC ("TRCL"), the FCC licensee of five radio stations and three FM translators located in the Texarkana market of Arkansas and Texas.

5) TRCL is the 100% owner of Jo-Al Broadcasting, Inc., the FCC licensee of one FM radio station in Texarkana, Arkansas.

6) My wife, Sharon Burns, is also a 10% owner of ABC, JAC and TRCL.

7) Both Sharon and I are Australian citizens who have been residents of Juneau, Alaska since 2006, and both of us are legally in the United States on E3 visa status.

I have reviewed the foregoing Petition for Declaratory Ruling and all of the facts stated therein are true and correct to the best of my knowledge, information and belief. I hereby declare under penalty of perjury that the foregoing is true and correct. Dated this 2<sup>ND</sup> day of June, 2016.

  
\_\_\_\_\_  
Richard J. Burns

## **EXHIBIT 1**

**EXHIBIT 1**

<b>Alaska Broadcast Communications, Inc.</b>		
<b>Station</b>	<b>Community of License</b>	<b>Facility ID No.</b>
KGTW(FM)	Ketchikan, AK	789
KTKN(AM)	Ketchikan, AK	788
KJNO(AM)	Juneau, AK	61235
KTKU(FM)	Juneau, AK	32950
KIFW(AM)	Sitka, AK	60516
KSBZ(FM)	Sitka, AK	60517
FM Translator K248AI	Craig, AK	790
FM Translator K258AD	Craig, AK	791
FM Translator K257CN	Mendenhall Valley, AK	32949
FM Translator K252EJ	Wrangell, AK	147853
<b>Juneau Alaska Communications, LLC</b>		
<b>Station</b>	<b>Community of License</b>	<b>Facility ID No.</b>
KINY(AM)	Juneau, AK	823
KSUP(FM)	Juneau, AK	820
KCBJ-LP (UHF Translator Station)	Juneau, AK	129332
KXXJ(AM)	Juneau, AK	161171
FM Translator K280ED	Hoonah, AK	777
FM Translator K280DX	Angoon, AK	821
FM Translator K300AB	Juneau, AK	822
FM Translator K278AC	Kake, AK	824
FM Translator K279AF	Haines & Skagway, AK	82616
FM Translator K284AM	Skagway, AK	137761

Texarkana Radio Center Licenses, LLC		
Station	Community of License	Facility ID No.
KCMC-AM	Texarkana, TX	33542
KTFS-AM	Texarkana, TX	33729
KTFS-FM	Texarkana, AR	33541
KBYB-FM	Hope, AR	33762
KTTY(FM)	New Boston, TX	165971
FM Translator K288FI	Texarkana, TX	156973
FM Translator K255CU	Texarkana / Nashville, AR	150918
FM Translator K257FY	Texarkana, TX	156971
Jo-Al Broadcasting, Inc.		
Station	Community of License	Facility ID No.
KTOY(FM)	Texarkana, AR	31348

## **EXHIBIT 2**

Richard John Burns  
3161 Channel Drive Suite 2  
Juneau, AK 99801  
907-586-3630  
[richard@abcstations.com](mailto:richard@abcstations.com)

***Summary:***

I began my broadcasting career in 1980 on-air and over the years did many shows including middays and mostly AM drive in a variety of markets in Australia. I moved into program directors roles and was a production director before moving into General Management at the age of 28. From there I held roles as Group GM for small clusters before moving to a state-based GM role and ultimately in the Divisional GM Role for what at the time was the largest radio group in Australia following significant changes to broadcast ownership rule limits. When the group was sold, I stayed with the sellers in a consultancy role for broadcasting and, with a joint venture partner, started a new radio group which grew its asset value significantly prior to starting a full service consultancy in broadcasting. It was during this time that I met Roy Paschal, the principal of Alaska Broadcasting Communications and two years later I was contacted by his business advisor to see if I would be prepared to come and run the Alaska Group – which I did in 2006.

- **Chief Executive Officer – Alaska Broadcast Communications 2006 - Current**  
Responsible for developing strategic media strategies for the company, including the development of new markets and positioning the brands to achieve maximum profitability, adapting technology to improve the business efficiency and developing a synergistic business model for future expansion. During this time the company has grown from a 6 station group in Southeast Alaska to a 15 station group in Alaska and Texas. The goal was to take a small family owned company and turn into a profitable enterprise and position it for the future, first through organic growth and then via acquisition. The company from a programming standpoint has a focus on a high degree of localism. A good example of this is the Juneau (a city of 30,000) local news operation which has a fully staffed local news room of two full time and two part time news people – a rarity in today's broadcast environment. All the stations in the group are highly community focused and involved in their respective communities. Shortly after purchasing the Texarkana stations we launched local news on all stations and local community information each hour as a way of better serving the community.

**Previous**

- **Director 2004-2006**  
Media Results International, a full service media consultancy firm dealing with clients in the United States, Australia, and South Africa. The company provides specialized advice on strategic media strategy for radio station owners and suppliers based on a holistic approach, including business plan development and evaluation, license and business valuation advice, specialist



research, format development and execution, sales and promotional strategies and talent development and training in all key disciplines. The company also produced station imaging and station promotional messages for client stations.

- **Chief Executive Officer 1998-2004**

Star Broadcasting Network Brisbane Australia, as CEO, I develop a radio network and grew the estimated capital asset value from \$8.6m to \$38m through improving profitability and the “stick value” of licenses held by the company. This was achieved through developing engineering strategies and developing methods to improve signal coverage. I also pioneered internet technologies for station programming and resource sharing to increase profitability.

- **Group General Manager 1996-1998**

Broadcasters Australia Limited, responsible for the operation of the largest commercial radio group ever to be operated by one company in Australia. The group comprised 39 stations in three states. Synergies and strategies were developed and employed to increase the group profitability and new systems were developed to operate effectively on this never-before-seen scale. The network operated on a flat and fast moving management structure. During my time with the network, I launched 18 new FM radio stations and developed programming and ancillary methods that provide maximum profit to the group on startup. During this time we also launched a joint venture with some smaller operators to create a national sales company in Melbourne to meet the goals of better promoting regional radio sales in that market.

- **Network General Manager 1994-1996**

Radio West Network, Broadcasters Australia Limited, my role was to take a group of 12 stations across the state of Western Australia that had been acquired from different owners and combine them into a cohesive and profitable group. This called for the development of a strategic approach to all facets of the business and the development of methods to make the business viable. Also added was a satellite uplink providing multiple program streams, production, back office and numerous ancillary functions. I conceptualized software that was employed to allow for local customization of stations programming.

- **General Manager – Maranoa Broadcasting Network 1989-1994**

The role called for making radio stations that had been loss makers into profit makers. To this end, I first developed analogue systems to provide customized programming to local stations from a central location. Through the understanding gained by these systems, it was then possible, as technology improved, to work with programmers in developing a computer based system to go beyond what was possible with the analogue system. This network was the first in Australia to provide local station customization for O&O stations, 18 hours per day. This had the benefit of greatly improving profitability, the quality of local programming and the asset value of the company. The company’s asset value grew from a little over \$1m to \$10.5m when the stations were sold some three years later.

- **Program Director – Wesgo Australia Limited 1985-1989**

I was responsible for the successful development and execution of a radio station format in a competitive market. The station went to number 1, all people aged 14+ in two years.

- **Morning On Air Personality / Music Director – Wesgo Australia Limited 1983-1985**  
My role was to host a daily morning radio show in a competitive market. The program called for editorial comment, talk back, and research and conducting interviews with guests of national importance. I also worked with our company consultants to research music and execute music policy.
- **Morning On Air Personality / Music Director – Associated Broadcasters Network 1982-1983**  
I was the number one morning show host in a market of 17 radio signals.
- Prior to this I undertook a number of on-air roles in various markets in Australia including:

Morning On-Air Personality / Program Director – 4VL Inc

Morning On-Air Personality / Program Director – Color Radio Network

Morning On-Air Personality / Program Director – 4 KZ Radio

### ***Relevant Achievements***

Past Board Member, Federation of Australian Radio Broadcasters (radio industry peak body)

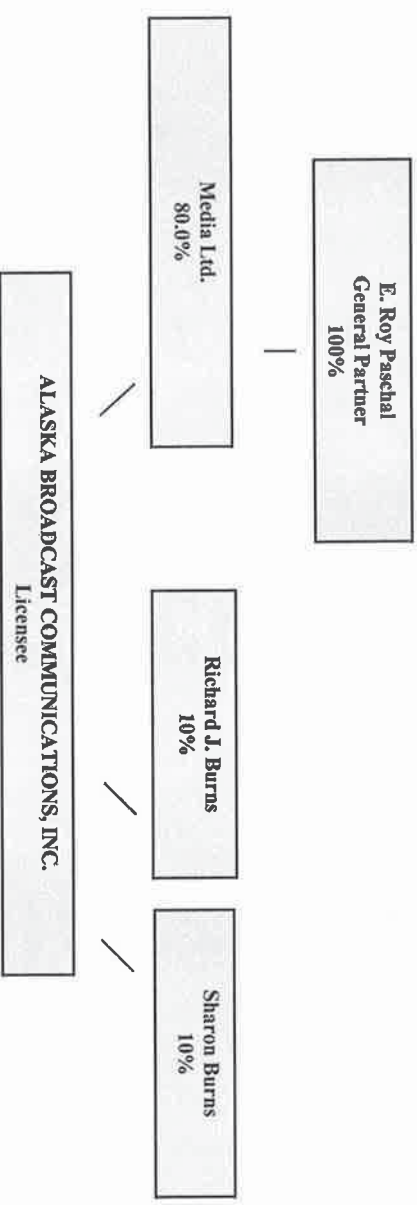
Graduate of Sydney University's Executive Development Program

Keynote speaker at the International Broadcast Conference – Johannesburg South Africa in 2003

Was a guest Communications lecturer at Queensland University of Technology in 2004

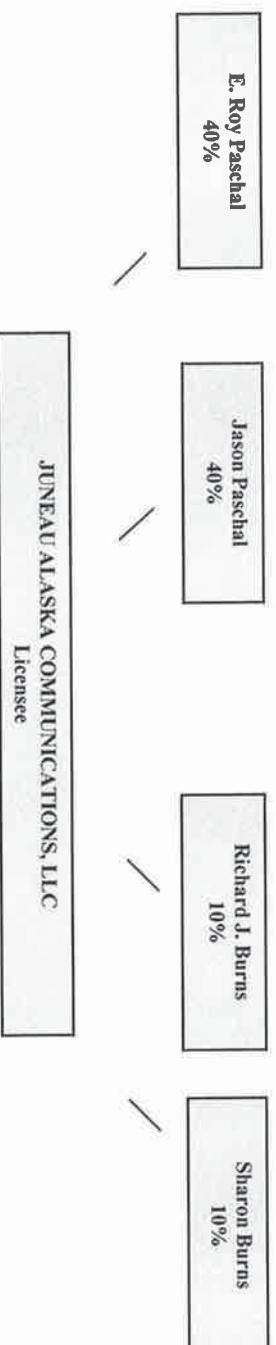
## **EXHIBIT 3**

# Alaska Broadcast Communications, Inc. Organizational Chart



## **EXHIBIT 4**

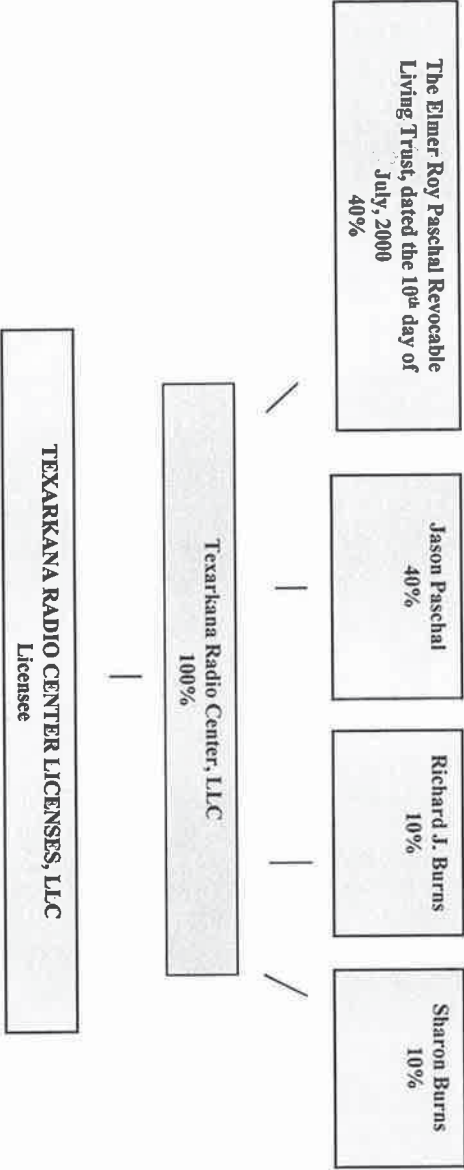
# Juneau Alaska Communications, LLC Ownership Chart



## **EXHIBIT 5**

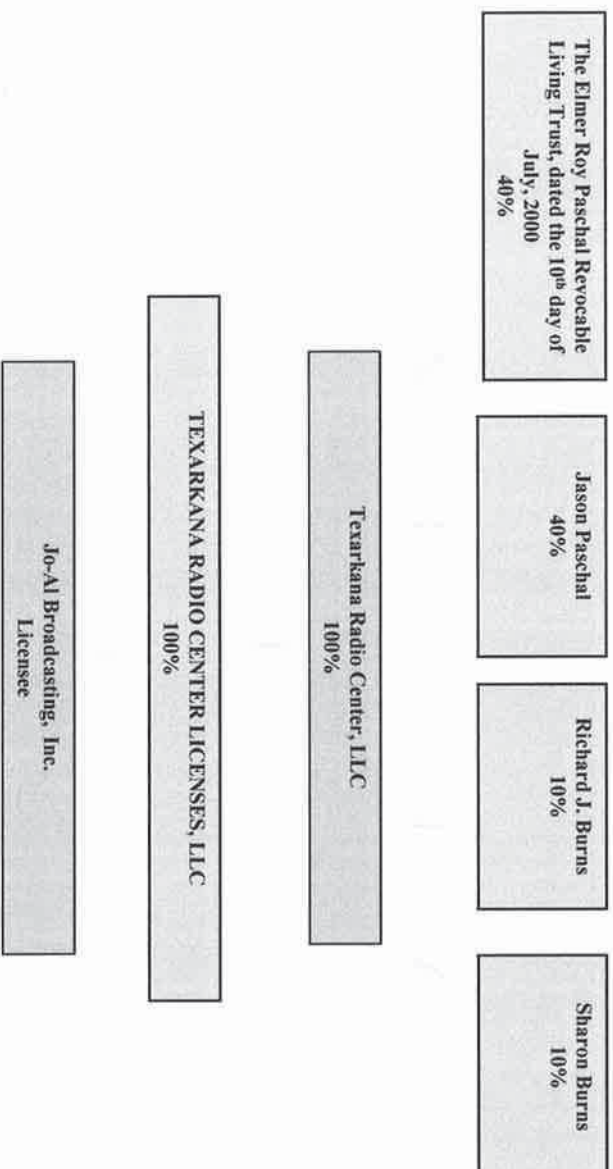


Texarkana Radio Center Licenses, LLC  
Organizational Chart



## **EXHIBIT 6**

# Jo-Al Broadcasting, Inc. Organizational Chart



## **EXHIBIT 7**

Customers and technology go together like **AT&T** and you.

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# Burns tapped as Citizen of the Year by Juneau Chamber

**Posted:** Sunday, October 31, 2010

By JONATHAN GRASS

The Juneau Chamber of Commerce awarded not one, but two Lifetime Achievement Awards plus its Citizen of the Year Award at this year's masquerade ball.

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 [Klas Stolpe / Juneau Empire](#)

(<http://images.morris.com/images/juneau/mdControlled/cms/2010/10/31/728795833.jpg>)

Klas Stolpe / Juneau Empire

Citizen of the Year went to Richard Burns, group CEO of Alaskan Broadcast Communications. Burns said the announcement of his name was a total surprise, as he's worked not for recognition but to do what's best for his community.

"We realize that media has a very important role to play in helping form and to galvanize community opinion and are just happy to be in a position to help do that," said Burns.

The Citizen of the Year Award goes to someone who recognizes the community above and beyond what others have done. The chief executive officer said his company puts a strong emphasis on community. It recently contributed \$128,000 to a radio campaign promoting shopping at local stores.

"The local first campaign is such important thing for the city," he said. "To us, that's such an important thing for residents and businesses and city growth. Whenever people buy Outside, that sales tax goes somewhere else and that doesn't help our city or our services or employment."

Alaska Broadcast Communications is based in Juneau and operates eight radio stations throughout Southeast Alaska. He said it is a source of pride for the company to focus on this region.

"We do what we do for the community, because of our community," he said, adding, "Doing this kind of stuff just seems normal to me."

The Lifetime Achievement Awards went to longtime residents Lloyd Johnson and Bob Janes.

"I'm deeply honored to receive this award from the Juneau Chamber of Commerce," said Janes. "Some of my predecessors on this award have been some close friends of mine. It's really an honor to follow those friends. Some are no longer with us."

Janes is a retired, after serving in the U.S. Forest Service for 38 years. Through his work as a forester and since, he has worked tirelessly on promoting outdoor recreation in Juneau. He stays busy with the Juneau Lions Club, the Gold Medal Basketball Tournament and Eaglecrest Ski Area. He's handled training in outdoor emergency care and still provides training in it.

Recently, Janes has worked on promoting development of the Blackerby Ridge multiple-access trail in Lemon Creek and is currently working on grant applications for it.

"It will provide multiple uses for many, many outdoor recreation users," he said. "It will be a great asset to our overall Juneau trails system."

Janes said he's always felt that is an important thing for outdoor recreation. He admires the U.S. Forestry Service's multiple-use management philosophy and that remains the only agency he's worked for as a forester.

Johnson has served as southeast regional manager for First National Bank of Alaska and stays active in youth sports, the Downtown Rotary Club and Hoop Time, saying his "passion is basketball."

His award is also due to his help in the bank's contributions and accomplishments as a supporter of the University of Alaska Southeast.

"I'm very moved, just very touched this. I don't know what to say. I'm just moved by the whole thing," he said of his recognition.

• Contact reporter Jonathan Grass at 523-2276 or at [jonathan.grass@juneauempire.com](mailto:jonathan.grass@juneauempire.com).

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## EXHIBIT 8





## REPRESENTATIVE CATHY MUÑOZ

May 23, 2016

To Whom It May Concern:

Richard and Sharon Burns have made significant contributions to the quality of life in Juneau and Southeast Alaska. They are civic-minded business people who are involved in numerous community organizations.

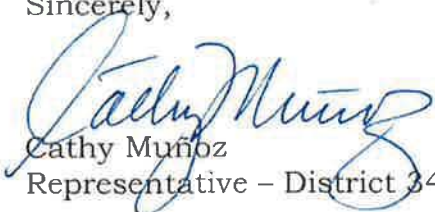
In recognition for his outstanding work in the community, Richard was recognized by the Juneau Chamber of Commerce as the "Citizen of the Year." This is one of Juneau's highest honors, and is given annually to an exemplary business person who goes above and beyond the call to encourage economic vitality and the well-being of our residents.

As a personal friend of Richard and Sharon, I am grateful for their commitment and energy to making Juneau one of the nation's great capital cities. Their dedication is inspiring. They have been active participants in showcasing the best of our community, and inspiring Juneau youth to excel.

As an active listener of KINY/KSUP, I can also attest to the quality and professionalism that is displayed in all aspects of their business each and every day.

I wholeheartedly endorse opportunities which will lead to Richard and Sharon's ability to expand and to continue to do what they do so well.

Sincerely,

  
Cathy Muñoz  
Representative – District 34

## **EXHIBIT 9**



# *The Juneau Chamber of Commerce*

9301 Glacier Hwy, Suite 110 • Juneau AK 99801

## **Board Members**

Dan Fabrello, *President*  
Jensen Yorba Lott  
Lance Stevens, *Past Pres*  
Alaska USA FCU  
Larry Gaffaney, *Treasurer*  
Huna Totem Corp.  
Rustan Burton, *Secretary*  
Juneau Empire  
Max Mertz  
Elgee Rehfeld Mertz  
Bill Peters,  
True North FCU  
Bruce Abel  
Don Abel Building Supply  
Travis McCain  
Alaska Litho  
Hayden Garrison  
Creative Source  
Charlie Williams  
Valley Paint Center  
Linda Thomas  
Alaskan Brewing Co  
Eric Eriksen  
AEL&P  
Erica Simpson  
Alaska Excursions  
Richard Burns  
ABC Stations  
Dan Bruce  
Baxter, Bruce & Sullivan

## **Benefactor Members**

Alaska Airlines  
Alaska Communications  
Alaska Marine Lines  
Exxon Mobil  
Fred Meyer  
Juneau Empire  
Huna Totem Corp  
Juneau Radio Center  
Northrim Bank  
Sealaska

## **Platinum Members**

AEL&P  
Alaska USA FCU  
Alaskan Brewing Company  
Allen Marine  
Bartlett Regional Hospital  
BP Alaska  
CBJ (Manager's Office)  
Capital Office Systems  
Chatham Electric  
Coeur Alaska, Inc.  
ConocoPhillips  
Coogan Construction  
Elgee Rehfeld & Mertz  
First Bank  
First National Bank of Alaska  
Goldbelt, Inc.  
Hecla Greens Creek Mining  
Key Bank  
SEARHC  
Shattuck & Grummett  
Samson Tug & Barge  
Taku Oil  
True North FCU  
UAS  
Wal-Mart  
Wells Fargo Bank of Alaska  
Wostmann and Associates

May 27, 2016

To Whom It May Concern:

It is s my great pleasure to write this letter of recommendation for Mr. Richard Burns.

I have known Richard since 2006, when he and his wife, Sharon, first arrived in Juneau. At that point in time, I was President & CEO of Alaska Pacific Bank (now Northrim Bank), and I developed both a professional and personal relationship with Richard.

Despite having just arrived from Australia, Richard and Sharon immediately connected with the community through Juneau's most active organizations; Rotary, the Juneau Chamber of Commerce, and the Juneau Convention and Visitors Bureau. I have had the opportunity to sit on various boards with Richard and I've come to respect him as a businessman, a community leader and a problem solver.

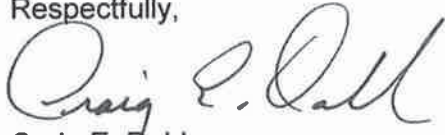
The best indicators of Richard's involvement and leadership are probably best framed by the fact that in 2010 – after only four years in Juneau – he was named "*Citizen of the Year*" by the Juneau Chamber of Commerce, an accolade reserved for people who exhibit extraordinary commitment to the community. Then in 2012 he was elected President of the Juneau Glacier Valley Rotary Club.

Richard's impact on the community is related directly to his leadership of the Juneau Radio Center stations, which have contributed enormously to the public interest. Under his management the stations are very active in all facets of the community and do a commendable job of serving the State Capital. Local news coverage from the fully staffed newsroom is excellent, and the community news programs like *Capital Chat* and *Action Line* have proven to be extremely effective channels for community leaders and organizations to reach out to the general public.

There are countless examples of how Richard has made sure that the Radio Center Stations serve the community; promoting food drives, supporting the thriving arts community and promoting various community groups and events. One example of this was in October of last year he turned over his number one station to Juneau Rotarians to raise money to fight polio as part of Rotary's *Annual World Polio Day* – a worldwide effort on a single day. It was a huge success raising over \$15,000 locally, which was matched by the Bill and Melinda Gates Foundation with an additional \$30,000 resulting in a \$45,000 contribution to fight polio.

In closing, it is easy to say that Richard embodies the very best of what a local business owner should be, giving of his time, talent, and resources to support the community in which he lives.

Respectfully,

A handwritten signature in black ink, appearing to read "Craig E. Dahl". The signature is fluid and cursive, with the first name "Craig" being more prominent.

Craig E. Dahl  
Executive Director  
Juneau Chamber of Commerce

## **EXHIBIT 10**

May 20<sup>th</sup>, 2016

To Whom It May Concern

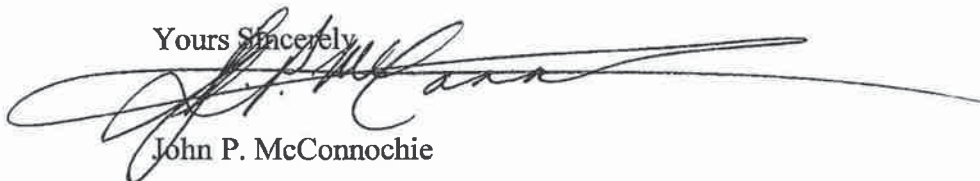
As Chair of the Juneau Convention and Visitors Bureau (JCVB) I am pleased to provide this letter of recommendation for Richard Burns.

I have known Mr. Burns both in his capacity as CEO of the Alaska Broadcast Communications Group and through his community work as an active long serving board member of the JCVB. Juneau's economy relies heavily on the visitor industry with just over 1 million visiting the city each year. It is no surprise to me that Mr. Burns has been voted to a board position three times to serve and lend his business acumen and support to the organization and the City of Juneau. He also serves as a board member on the very active Juneau Chamber of Commerce where in 2010 only a few years after coming to Juneau he earned the very prestigious Citizen of the Year award.

I have witnessed Mr. Burns as CEO develop what was two small Juneau stations into a dynamic five station group serving a wide range of populations in the city. Stations that serve the community interest in ways that had not been done previously. I firmly believe in the concept of 'paying your civic rent' by giving back to the community and it's very clear by his actions and high level of community involvement that Mr. Burns puts this principle to work. The stations are very involved and active from local sports coverage to all over Alaska where Juneau teams compete, to promotion of service clubs projects, to major initiatives benefiting the community such as the wildly successful Look Local First campaign, to his passion for developing a new tourism business for the city, food drives to help those in deep need to family events like the 'Day at the Lake' and supporting the vibrant arts community.

Put simply, the Juneau Radio Center stations during Mr. Burns' tenure have contributed enormously to the public interest which is not limited to community involvement but also through uniquely Juneau radio programs like Capital Chat which is so popular that the calendar is booked weeks in advance, to valuable news programming like Actionline and the 'very Juneau' – Problem Corner on KINY. That in my mind is what serving the public interest is all about – stations providing local programs of interest and value and are actively involved in helping the community they serve.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'John P. McConnochie', with a long horizontal flourish extending to the right.

John P. McConnochie

Chair Juneau Convention and Visitor Bureau

## EXHIBIT 11



**To Whom It May Concern**

The Texarkana Radio Center since commencing operation in our region in 2013 has contributed in meaningful ways to our community. The City of New Boston is the seat of government for the county and our local station KTTY had been off air for some time when Richard Burns' group purchased it and returned it to the airwaves adding a station to the region to that provides, news and community information.

From my experience, all the stations operated by the Burns group of stations are very active in the community, featuring interviews with a range of guests about local issues and highlighting local events. It feels like we have a voice, where previously we didn't.

The stations are also at the forefront for keeping the community up to date of local safety issues like the severe flooding our region recently experienced. The stations kept residents informed about flood levels. This connection to the community is very important and in some cases lifesaving and there is no better service to the community which the stations serve.

As Mayor of the City of New Boston, I am delighted with the way the stations under Mr. Burns' management have immersed themselves in the community and provide a service that was until they purchased the stations missing from our area.

This is the way radio *used* to be and I'm delighted to see that some people still do it that way.

Sincerely,

Johnny Branson  
Mayor  
City of New Boston, Texas



P.O. Box 5  
301 East North Front  
New Boston, TX 75570

PHONE (903) 628-5596  
FAX (903) 628-6034

## **EXHIBIT 12**

Deborah Lann, Executive Assistant  
903-628-6718  
903-628-6719 Fax  
Email: countyjudge@txkusa.org



JAMES M. CARLOW  
COUNTY JUDGE  
BOWIE COUNTY

Bowie County Courthouse  
P.O. Box 248  
710 James Bowie Drive  
New Boston, TX 75570

May 27, 2016

To Whom It May Concern:

The stations operated by Richard Burns' radio group – since taking them over in 2013 - has given the community stations that work hard to serve the towns in the area.

As County Judge of Bowie County it was pleasing to me to see that a local station KTTY – which had been off air for some time - was returned quickly to the airwaves. This added a station to our county that involves and engages at every opportunity. The station also helps community organizations across the area with regular community information and local news – something that had been missing.

The City of New Boston – seat of government for Bowie County- features often on the group's news station KTFS with many interviews about local events the city host and items of interest. The city's events like our Pioneer Days Festival and annual 4th of July Fireworks are well covered by the stations in Burn's group. Beyond this, the stations provide severe weather updates which are very valuable in this region to residents. There's no better example of this than last year when many parts of the region suffered tremendous flooding. The stations provided flood stage reports for many weeks and post the flooding a platform for F.E.M.A to inform residents on the services they could access and assistance – all very important for the radio station to serve the community.

To further demonstrate Richard Burns' positive leadership of the stations they also provided an important forum in our community as various votes have taken place on alcohol sales and whether certain areas in the county remain a 'wet' or 'dry'.

Since the group took over the stations Richard Burns has had a positive impact with the stations going above and beyond in providing service to the region something which as County Judge of Bowie County I appreciate.

Respectfully,

James M. Carlow  
Bowie County Judge

## **EXHIBIT 13**



To Whom It May Concern:

I first met Richard Burns prior to his group purchasing what has become his group's stations in Texarkana/Hope/New Boston. At that time, I was President and CEO of the Texarkana AR/TX Chamber of Commerce and Richard asked me what I thought the stations could do to better serve the community.

After the purchase of the stations I watched Richard greatly improve the stations' commitment to the local area and do it in a considered way. The staff was increased with live programming on a station that had only played music in the past. Formats were changed and updated to better reflect our region's and thus provided real choices for listeners - especially in areas of information, country and more. Local news was added to all stations, giving the community a voice that had not been available on this (the country format) station with a large reach in the four states area. Mr. Burns also put a station back on the air that had been on and off for years – KTTY New Boston – with an oldies format, again providing choice in the market where there had been none previously.

His group purchase of the stations coincided with KTFS AM - which had been off air prior to his group's purchase - returning to the air waves and providing a station to the areas outside of Texarkana proper. Richard also launched a new station, aimed at a younger demographic, again offering diversity of choice that didn't previously exist. A number of small FM stations were added to the AM stations as well. Along with the programming enhancements, the stations added much-needed community announcements each hour – again giving a voice to local organizations where one did not previously exist. The news/talk station started a local community-based interview show to focus on the many and varied groups in the region and to give them another opportunity to engage the community.. Conversely, the listeners received information previously not available (prior to Richard's group purchasing the stations).

The stations are extremely active in the community, providing unique programming in many cases and a reach into the community that goes above and beyond just serving the community interest.

An example of this is the true story of a young lady from Hope AR – Brandy Glass-Aaron. Ms. Glass-Aaron needed help with a major medical procedure for a brain tumor following ongoing treatments she had received since childhood. The morning program on HOT FM got behind the cause and launched an appeal to the public. They promoted it heavily to raise funds for this amazing young woman. The touching interviews with her throughout the course of her treatment helped create a movement within the community as listeners developed were moved by her and

her family's plight thanks to HOT FM's morning show's responsiveness. This all began with a simple request for a PSA.

I can honestly say that Richard Burns and his group have had a positive impact in the Texarkana region. In addition to creating real choice for listeners where there was none, they also provided local news, information and community group access where there was none. Additionally, community access to stations increased significantly and job creation became the norm in an arena where there was none. The community interest has been well and truly served by the initiatives that Richard has put in place since his group's ownership of Texarkana Radio Center stations. He and his team are indeed community servants.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff K. Sanford". The signature is stylized with a large, looped "J" and "S".

Jeff K. Sanford,  
President & CEO  
903-490-1400