

## **Rolanda Faye Smith**

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**From:** Lee Peltzman <lee@s-plaw.com>  
**Sent:** Wednesday, March 21, 2018 9:07 PM  
**To:** Rolanda Faye Smith  
**Subject:** RE: KQV, File No. BAL-20180131AJJ

Ms. Smith, In the Assignment Application filed with the Commission for KQTZ-FM, Loch Lynn Heights, MD, Facility ID No. 64662 (formerly known as Station WDKL) (BALED-20150625ADU), the following was provided at Exhibit 14 (Ownership Information) of the Assignment Application regarding the proposed ownership by Robert Stevens and Ashley Stevens in the Assignee, Broadcast Communications, Inc.:

"This will explain the ownership structure of the Assignee, Broadcast Communications, Inc. (BCI). BCI is owned by a husband and wife, Robert and Ashley Stevens, as Tenants by the Entirety. Robert and Ashley Stevens have owned BCI, which has been a Commission licensee, for several years, in the same manner as proposed in this [WDKL] Assignment Application."

"Tenancy by the Entirety is defined as a legal entity involving a husband and wife, which places all title to the property in the marital unit, with both spouses having an equal, undivided interest in the whole property. In essence, each spouse owns the entire estate and their property ownership is an individual entirety. Upon the death of one spouse, the survivor succeeds to the entire property to the exclusion of heirs and creditors of the deceased spouse without the need for probate."

"Because each spouse owns an undivided interest in BCI, the Application states that Robert Stevens and Ashley Stevens each own 100% of BCI. However, since both Robert and Ashley Stevens own an equal interest in the Applicant and their ownership structure is for estate reasons having nothing to do with the ownership and control of the station in question, for the sake of more efficient processing, this Application may be viewed as if each of them has an equal 50% ownership and control of BCI, the Assignee corporation."

The above information with respect to Mr. and Mrs. Stevens' ownership of BCI, to the best of my knowledge as communications counsel to BCI and Robert and Ashley Stevens, remains as accurate at this time as it was when stated in the Assignment Application filed in June 2015. I hope this explanation is helpful. Lee Peltzman

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**From:** Rolanda Faye Smith [mailto:[Rolanda-Faye.Smith@fcc.gov](mailto:Rolanda-Faye.Smith@fcc.gov)]  
**Sent:** Tuesday, March 20, 2018 2:28 PM  
**To:** Lee Peltzman <lee@s-plaw.com>  
**Subject:** KQV, File No. BAL-20180131AJJ

Mr. Peltzman,

As a follow-up to my voicemail, this correspondence is to provide my email address ([Rolanda-Faye.Smith@fcc.gov](mailto:Rolanda-Faye.Smith@fcc.gov)) so you can file an informal response to our request to provide an explanation, regarding how Robert M. Stevens and Ashley R. Stevens each own 100% of Broadcast Communications, Inc. as stated in the Parties to the Application in the assignment of license application for Station KQV, File No. BAL-20180131AJJ. As stated in the voicemail, my independent research revealed that an ownership report, File No. BOA-20070529AEY was filed stating that Mr. and Mrs. Stevens are both Tenant in the Entirety as it relates to the ownership structure of Broadcast Communications, Inc.

Thank you,

# Ownership Report

## BOA - 20070529 AEY

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Application Information - BOA-20070529AEY - 323

Callsign: WYPM Community: CHAMBERSBURG PA Chan: 227 Service: FM  
Licensee: WITF, INC. Status: LICENSED Fac Id: 49384 Exp Date: 08/01/2022

General Information | Contracts/Capitalization | Ownership Info | Ownership Structure | Relationships/Exemptions/Interests | Other Interests | Administration

Name and Address	Gender	Ethnicity	Race	Citizenship	Positional Interest	Percentage of Votes	Percentage of Equity
ROBERT M. STEVENS, TENANT IN THE ENTIRETY, P.O. BOX 990, GREENSBURG, PA 15601	M	N	W	US	PRESIDENT	100.00	100.00
ASHLEY R. STEVENS, TENANT IN THE ENTIRETY, P.O. BOX 990, GREENSBURG, PA 15601	F	N	W	US	VICE PRESI	100.00	100.00

# Broadcast Communications

Ready

