



(REFERENCE COPY - Not for submission)

Commercial Broadcast Stations Biennial
Ownership Report (FCC Form 323)

File Number: 0000229646 | Submit Date: 2023-11-30 | FRN: 0003583515

Purpose: Commercial Broadcast Stations Biennial Ownership Report | Status: Received | Status Date: 12/01/2023

Filing Status: Active

Section I - General Information

1. Respondent

FRN		Entity Name			
0003583515		Hall Communications, Inc.			

Street Address	City (and Country if non U.S. address)	State ("NA" if non-U.S. address)	Zip Code	Phone	Email
404 West Lime Street	Lakeland	FL	33815	+1 (863) 682-8184	ddubonnet@hallradio.net

2. Contact Representative

Name		Organization			
Susan April Marshall, Esq.		Shainis & Peltzman, Chartered			

Street Address	City (and Country if non U.S. address)	State	Zip Code	Phone	Email
1850 M Street NW Suite 240	Washington	DC	20036	+1 (202) 293-0011	susan@s-plaw.com

3. Application Filing Fee

Question	Response
Is this application being submitted without a filing fee?	No

Fees

Application Type	Form Number	Fee Code	Quantity	Fee Amount	Subtotal
Biennial	Form 323	MAR	17	95	\$1,615.00
				Total	\$1,615.00

4. Nature of Respondent

(a) Provide the following information about the Respondent:

Relationship to stations/permits	Licensee
Nature of Respondent	For-profit corporation

(b) Provide the following information about this report:

Purpose	Biennial
"As of" date	10/01/2023 When filing a biennial ownership report or validating and resubmitting a prior biennial ownership report, this date must be Oct. 1 of the year in which this report is filed.

5. Licensee(s) and Station(s)

Respondent is filing this report to cover the following Licensee(s) and station(s):

Licensee/Permittee Name	FRN
Hall Communications, Inc.	0003583515

Fac. ID No.	Call Sign	City	State	Service
7839	WIZN	VERGENNES	VT	FM
10341	WLKF	LAKELAND	FL	AM
25406	WNLC	EAST LYME	CT	FM
25864	WJOY	BURLINGTON	VT	AM
25866	WNBH	NEW BEDFORD	MA	AM
25867	WOKO	BURLINGTON	VT	FM
25868	WONN	LAKELAND	FL	AM
25869	WCTK	NEW BEDFORD	MA	FM
25872	WPCV	WINTER HAVEN	FL	FM
48547	WKNL	NEW LONDON	CT	FM
52807	WBTZ	PLATTSBURGH	NY	FM
66179	WILI-FM	WILLIMANTIC	CT	FM
66180	WILI	WILLIMANTIC	CT	AM
68692	WKOL	PLATTSBURGH	NY	FM
72346	WCTY	NORWICH	CT	FM
72347	WICH	NORWICH	CT	AM

72687	WWRZ	FORT MEADE	FL	FM
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Section II – Biennial Ownership Information

1. 47 C.F.R. Section 73.3613 and Other Documents

Licensee Respondents that hold authorizations for one or more full power television, AM, and/or FM stations should list all contracts and other instruments set forth in 47 C.F.R. Section 73.3613(a) through (c) for the facility or facilities listed on this report. In addition, attributable Local Marketing Agreements (LMAs) and attributable Joint Sales Agreements (JSAs) must be disclosed by the licensee of the brokering station on its ownership report. If the agreement is an attributable LMA, an attributable JSA, or a network affiliation agreement, check the appropriate box. Otherwise, select “Other.” Non-Licensee Respondents, as well as Licensee Respondents that only hold authorizations for Class A television and/or low power television stations, should select “Not Applicable” in response to this question.

Document Information	
Description of contract or instrument	Amendment to 1980 Trust Agreement
Parties to contract or instrument	Robert M. Hall, Grantor, and Ruth D. Hall and Robert M. Hall, Trustees
Date of execution	10/1986
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Amendment to a Trust Agreement

Document Information	
Description of contract or instrument	Appointment of Bonnie H. Rowbotham and Howard S. Tuthill, as Additional Trustees of 6/6/80 Trust
Parties to contract or instrument	Robert M. Hall, Grantor
Date of execution	09/1997
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Appointment of Additional Trustees to a Trust

Document Information	
Description of contract or instrument	Stock Pledge Agreements with Hall Communications, Inc., Bonnie H. Rowbotham and Arthur J. Rowbotham
Parties to contract or instrument	TD Bank, NA
Date of execution	10/2005
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Stock Pledge Agreements

Document Information	
Description of contract or instrument	Amendment to 1980 Trust Agreement
Parties to contract or instrument	Robert M. Hall, Grantor, and Ruth D. Hall and Robert M. Hall, Trustees
Date of execution	11/1981
Date of expiration	No expiration date

Agreement type (check all that apply)	Other Agreement Type: Amendment to Trust Agreement
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Document Information	
Description of contract or instrument	Agreement of Merger
Parties to contract or instrument	Hall Communications, Inc.
Date of execution	02/1975
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Merger Agreement

Document Information	
Description of contract or instrument	Certificate of Ownership and Merger
Parties to contract or instrument	Hall Communications, Inc.
Date of execution	09/1981
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Certificate of Ownership and Merger

Document Information	
Description of contract or instrument	By-Laws
Parties to contract or instrument	Hall Communications, Inc.
Date of execution	11/1974
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: By-Laws

Document Information	
Description of contract or instrument	Certificate of Amendment of Certificate of Incorporation
Parties to contract or instrument	Hall Communications, Inc.
Date of execution	05/1980
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Certificate of Amendment of Certificate of Incorporation

Document Information	
Description of contract or instrument	Certificate of Amendment of Certificate of Incorporation
Parties to contract or instrument	Hall Communications, Inc.
Date of execution	12/1975
Date of expiration	No expiration date

Agreement type (check all that apply)	Other Agreement Type: Certificate of Amendment of Certificate of Incorporation
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Document Information	
Description of contract or instrument	Amendment to and Reinstatement of 1980 trust Agreement
Parties to contract or instrument	Robert M. Hall, as Grantor, and Robert M. Hall and Ruth D. Hall, as Trustees
Date of execution	08/1995
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Amendment and Reinstatement of a Trust

Document Information	
Description of contract or instrument	Trust Agreement
Parties to contract or instrument	Robert M. Hall, Settler, and Bonnie H. Rowbotham and Howard S. Tuthill, Trustees
Date of execution	08/1967
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Trust

Document Information	
Description of contract or instrument	Trust Agreement
Parties to contract or instrument	Robert M. Hall, Grantor, and Ruth D. Hall and Robert M. Hall, Trustees
Date of execution	06/1980
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Trust Agreement

Document Information	
Description of contract or instrument	Loan Agreement
Parties to contract or instrument	TD Banknorth, NA
Date of execution	10/2005
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Loan Agreement

Document Information	
Description of contract or instrument	Voting Trust Agreement
Parties to contract or instrument	Shareholders of Hall Communications, Inc. and Robert M. Hall

Date of execution	04/1976
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Voting Trust Agreement

Document Information	
Description of contract or instrument	Certificate of Incorporation
Parties to contract or instrument	Hall Communications, Inc.
Date of execution	11/1974
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Certificate of Incorporation

Document Information	
Description of contract or instrument	Amended and Restated Loan Agreement
Parties to contract or instrument	By and among Hall Communications, Inc. and TD Bank, N.A.
Date of execution	09/2018
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Amended and Restated Loan Agreement

Document Information	
Description of contract or instrument	Amended and Restated Stock Pledge Agreement
Parties to contract or instrument	By and between Bonnie H. Rowbotham and TD Bank, N.A.
Date of execution	09/2018
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Amended and Restated Stock Pledge Agreement

Document Information	
Description of contract or instrument	Amended and Restated Stockholders' Agreement
Parties to contract or instrument	Stockholders of Hall Communications, Inc. and Arthur A. Rowbotham
Date of execution	07/2023
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Corporate Document

Document Information	
Description of contract or instrument	Certificate of Amendment to Certificate of Incorporation
Parties to contract or instrument	State of Delaware

Date of execution	07/2023
Date of expiration	No expiration date
Agreement type (check all that apply)	Other Agreement Type: Corporate Document

2. Ownership Interests

(a) Ownership Interests. This Question requires Respondents to enter detailed information about ownership interests by generating a series of subforms. Answer each question on each subform. The first subform listing should be for the Respondent itself. If the Respondent is not a natural person, also list each of the officers, directors, stockholders, non-insulated partners, non-insulated members, and any other persons or entities with a direct attributable interest in the Respondent pursuant to the standards set forth in 47 C.F.R. Section 73.3555. (A “direct” interest is one that is not held through any intervening companies or entities.) List each interest holder with a direct attributable interest in the Respondent separately.

Leave the percentage of total assets (Equity Debt Plus) field blank for an interest holder unless that interest holder has an attributable interest in the Respondent solely on the basis of the Commission’s Equity Debt Plus attribution standard, 47 C.F.R. Section 73.3555, Note 2(i).

In the case of vertical or indirect ownership structures, list only those interests in the Respondent that also represent an attributable interest in the Licensee(s) for which the report is being submitted.

Entities that are part of an organizational structure that includes holding companies or other forms of indirect ownership must file separate ownership reports. In such a structure do not report, or file a separate report for, any interest holder that does not have an attributable interest in the Licensee(s) for which the report is being submitted.

Please see the Instructions for further detail concerning interests that must be reported in response to this question.

The Respondent must provide an FCC Registration Number for each interest holder reported in response to this question. Please see the Instructions for detailed information and guidance concerning this requirement.

Ownership Information			
FRN	0003583515		
Entity Name	Hall Communications, Inc.		
Address	PO Box		
	Street 1	404 West Lime Street	
	Street 2		
	City	Lakeland	
	State ("NA" if non-U.S. address)	FL	
	Zip/Postal Code	33815	
	Country (if non-U.S. address)	United States	
Listing Type	Respondent		
Positional Interests (check all that apply)	Respondent		
Tribal Nation or Tribal Entity	Interest holder is not a Tribal nation or Tribal entity		
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	0.0%	Jointly Held? No
	Equity	0.0%	
	Total assets (Equity Debt Plus)	0.0%	

Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?	No
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Ownership Information			
FRN	0019640671		
Entity Name	1967 Trust Agreement		
Address	PO Box		
	Street 1	404 West Lime Street	
	Street 2		
	City	Lakeland	
	State ("NA" if non-U.S. address)	FL	
	Zip/Postal Code	33815	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		
Positional Interests (check all that apply)	Stockholder		
Tribal Nation or Tribal Entity	Interest holder is not a Tribal nation or Tribal entity		
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	24.5%	Jointly Held? No
	Equity	66.2%	
	Total assets (Equity Debt Plus)	0.0%	
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?			No

Ownership Information			
FRN	0019415983		
Name	Erin R. Casey, Esq.		
Address	PO Box		
	Street 1	404 West Lime Street	
	Street 2		
	City	Lakeland	
	State ("NA" if non-U.S. address)	FL	
	Zip/Postal Code	33815	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		

Positional Interests (check all that apply)	Officer, Director, Stockholder		
Citizenship, Gender, Ethnicity, and Race Information (Natural Persons Only)	Citizenship	US	
	Gender	Female	
	Ethnicity	Not Hispanic or Latino	
	Race	White	
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	1.2%	Jointly Held? No
	Equity	1.6%	
	Total assets (Equity Debt Plus)	0.0%	
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?			No

Ownership Information			
FRN	0022413124		
Name	Janet P. Hamm		
Address	PO Box		
	Street 1	404 West Lime Street	
	Street 2		
	City	Lakeland	
	State ("NA" if non-U.S. address)	FL	
	Zip/Postal Code	33815	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		
Positional Interests (check all that apply)	Officer		
Citizenship, Gender, Ethnicity, and Race Information (Natural Persons Only)	Citizenship	US	
	Gender	Female	
	Ethnicity	Not Hispanic or Latino	
	Race	White	
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	0.0%	Jointly Held? No
	Equity	0.0%	
	Total assets (Equity Debt Plus)	0.0%	
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?			No

FRN	0019415827		
Name	Arthur J. Rowbotham, Esq.		
Address	PO Box		
	Street 1	404 West Lime Street	
	Street 2		
	City	Lakeland	
	State ("NA" if non-U.S. address)	FL	
	Zip/Postal Code	33815	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		
Positional Interests (check all that apply)	Officer, Director, Stockholder		
Citizenship, Gender, Ethnicity, and Race Information (Natural Persons Only)	Citizenship	US	
	Gender	Male	
	Ethnicity	Not Hispanic or Latino	
	Race	White	
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	1.0%	Jointly Held? No
	Equity	1.3%	
	Total assets (Equity Debt Plus)	0.0%	
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?			No

Ownership Information			
FRN	0022413140		
Name	Arthur A. Rowbotham		
Address	PO Box		
	Street 1	404 West Lime Street	
	Street 2		
	City	Lakeland	
	State ("NA" if non-U.S. address)	FL	
	Zip/Postal Code	33815	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		
Positional Interests (check all that apply)	Officer, Director		

Citizenship, Gender, Ethnicity, and Race Information (Natural Persons Only)	Citizenship	US	
	Gender	Male	
	Ethnicity	Not Hispanic or Latino	
	Race	White	
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	0.0%	Jointly Held? No
	Equity	0.0%	
	Total assets (Equity Debt Plus)	0.0%	
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?			No

Ownership Information			
FRN	0022413090		
Name	Benjamin H. Rowbotham		
Address	PO Box		
	Street 1	404 West Lime Street	
	Street 2		
	City	Lakeland	
	State ("NA" if non-U.S. address)	FL	
	Zip/Postal Code	33815	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		
Positional Interests (check all that apply)	Officer, Director, Stockholder		
Citizenship, Gender, Ethnicity, and Race Information (Natural Persons Only)	Citizenship	US	
	Gender	Male	
	Ethnicity	Not Hispanic or Latino	
	Race	White	
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	0.5%	Jointly Held? No
	Equity	0.6%	
	Total assets (Equity Debt Plus)	0.0%	
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?			No

Ownership Information	
FRN	0019415959

Name	Bonnie H. Rowbotham		
Address	PO Box		
	Street 1	404 West Lime Street	
	Street 2		
	City	Lakeland	
	State ("NA" if non-U.S. address)	FL	
	Zip/Postal Code	33815	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		
Positional Interests (check all that apply)	Officer, Director, Stockholder		
Citizenship, Gender, Ethnicity, and Race Information (Natural Persons Only)	Citizenship	US	
	Gender	Female	
	Ethnicity	Not Hispanic or Latino	
	Race	White	
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	72.8%	Jointly Held? No
	Equity	30.3%	
	Total assets (Equity Debt Plus)	0.0%	
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?			No

Ownership Information			
FRN	0034554956		
Name	Daniel Dubenetsky		
Address	PO Box		
	Street 1	70 Joy Drive	
	Street 2		
	City	South Burlington	
	State ("NA" if non-U.S. address)	VT	
	Zip/Postal Code	05403	
	Country (if non-U.S. address)	United States	
Listing Type	Other Interest Holder		
Positional Interests (check all that apply)	Officer		
Citizenship, Gender,	Citizenship	US	

Ethnicity, and Race Information (Natural Persons Only)	Gender	Male	
	Ethnicity	Not Hispanic or Latino	
	Race	White	
Interest Percentages (enter percentage values from 0.0 to 100.0)	Voting	0.0%	Jointly Held? No
	Equity	0.0%	
	Total assets (Equity Debt Plus)		
Does interest holder have an attributable interest in one or more broadcast stations that do not appear on this report?			No

(b) Respondent certifies that any interests, including equity, financial, or voting interests, not reported in this filing are non-attributable. If "No," submit as an exhibit an explanation.	Yes
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(c) Are any of the individuals listed as an attributable interest holder in the Respondent married to each other or related to each other as parentchild or as siblings? If " <u>Yes</u> ," provide the following information for each such the relationship.	Yes
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Family Relationships			
FRN	0019415959	Name	Bonnie H Rowbotham
FRN	0019415983	Name	Erin R Casey , Esq. .
Relationship	Parent/Child		

Family Relationships			
FRN	0022413090	Name	Benjamin H Rowbotham
FRN	0022413140	Name	Arthur A Rowbotham
Relationship	Siblings		

Family Relationships			
FRN	0019415827	Name	Arthur J Rowbotham , Esq. .
FRN	0019415983	Name	Erin R Casey , Esq. .
Relationship	Parent/Child		

Family Relationships			
FRN	0019415959	Name	Bonnie H Rowbotham
FRN	0022413090	Name	Benjamin H Rowbotham
Relationship	Parent/Child		

Family Relationships			
FRN	0019415827	Name	Arthur J Rowbotham , Esq. .
FRN	0022413090	Name	Benjamin H Rowbotham

Relationship	Parent/Child
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Family Relationships			
FRN	0019415983	Name	Erin R Casey , Esq. .
FRN	0022413140	Name	Arthur A Rowbotham
Relationship	Siblings		

Family Relationships			
FRN	0019415959	Name	Bonnie H Rowbotham
FRN	0022413140	Name	Arthur A Rowbotham
Relationship	Parent/Child		

Family Relationships			
FRN	0019415827	Name	Arthur J Rowbotham , Esq. .
FRN	0022413140	Name	Arthur A Rowbotham
Relationship	Parent/Child		

Family Relationships			
FRN	0019415827	Name	Arthur J Rowbotham , Esq. .
FRN	0019415959	Name	Bonnie H Rowbotham
Relationship	Spouses		

Family Relationships			
FRN	0019415983	Name	Erin R Casey , Esq. .
FRN	0022413090	Name	Benjamin H Rowbotham
Relationship	Siblings		

<p>(d) Is Respondent seeking an attribution exemption for any officer or director with duties wholly unrelated to the Licensee(s)?</p> <p>If "Yes," complete the information in the required fields and submit an Exhibit fully describing that individual's duties and responsibilities, and explaining why that individual should not be attributed an interest.</p>	No
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3. Organizational Chart (Licensees Only)

Attach a flowchart or similar document showing the Licensee’s vertical ownership structure including the Licensee and all entities that have attributable interests in the Licensee. Licensees with a single parent entity may provide a brief explanatory textual Exhibit in lieu of a flowchart or similar document. Licensees without parent entities should so indicate in a textual Exhibit.

Non-Licensee Respondents should select “N/A” in response to this question.

File Name	Uploaded By	Attachment Type	Description
Hall_Ownership_Exhibit_Flow_Chart_(Rev.10-1-2023).pdf	Applicant	Ownership Chart	Ownership Structure Diagram

Section III - Certification

Certification

Section	Question	Response
Authorized Party to Sign	WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND /OR REVOCATION OF ANY STATION LICENSE --OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).	
Certification	I certify that I have examined this report and that to the best of my knowledge and belief, all statements in this report are true, correct and complete.	Official Title: President Exact Legal Title or Name of Respondent: Hall Communications, Inc. Name: Arthur J. Rowbotham , Esq. Phone: 8636828184 11/30/2023