

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In re Application of)
)
Marion R. Williams) File No. 0000100898
Radio Station WONG)
Facility ID # 31587)
Canton, Mississippi)
)
)
For Renewal of License)

To: Chief, Media Bureau

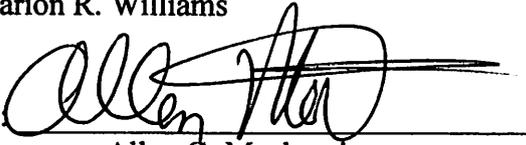
OPPOSITION TO INFORMAL OBJECTION

Marion R. Williams, by its attorney, and pursuant to Section 73.3587 of the Commission’s rules, hereby respectfully submits its “Opposition to Informal Objection” with respect, to the “Informal Objection’, as characterized by Commission Staff, to the above-referenced renewal application of WONG(AM), Canton, Mississippi filed by Mark Jones. In support thereof the following is shown:

1. Mr. Jones’ only allegation, totally unsupported by ANYTHING, consists of the sentence: “WONG 1150 AM has been off the air for many months.” Mr. Jones is either delusional or less than honest.
2. Attached hereto is the Declaration of Frederick Sanders, Chief Engineer of WONG, who states that WONG has not been off the air for anytime in at least the last year except for routine maintenance.
3. Also attached hereto are the letters of Dr. William Truly, the Mayor of Canton, Anthony Denton and Keith B. Warfield, all listeners of WONG who reside in the listening area and who state that the station is on the air and has been for at least 6 months.
4. Consequently, Mr. Jones allegation must be rejected. No evidence has been presented to show that the station has been off the air. The licensee has submitted documentation from listeners and WONG’s Chief Engineer that the station IS and WAS on the air.

WHEREFORE, B+ Broadcasting, LLC respectfully requests that the Commission grant its Informal Objection and dismiss with prejudice the above-referenced application of S Content Marketing, LLC.

Respectfully submitted,
Marion R. Williams

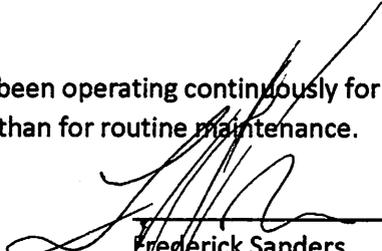
By: 
Allan G. Moskowitz
His Attorney

Allan G. Moskowitz, Esq.
10854 Tuckahoe Way
North Potomac, MD 20878
(301) 908-4165
April 30, 2021

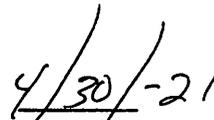
DECLARATION

I, Frederick Sanders, declare under penalty, that the following is true and accurate to the best of my knowledge and belief:

1. I am Chief Engineer of Radio Station WONG (AM), Canton, Mississippi and have held this position for the last ten (10) years.
2. Radio Station WONG has been operating continuously for the past year, at least, and has not been silent other than for routine maintenance.



Frederick Sanders
Chief Engineer

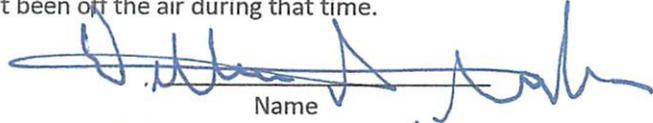


Date

Federal Communications Commission
Washington, DC 20554

Dear Sirs:

This will confirm that I am a regular listener to Radio Station WONG(AM), Canton, Mississippi and reside in the station's listening area. This will certify that WONG(AM) has been operating and broadcasting for at least the last six (6) months and has not been off the air during that time.


Name
723 Kathy Circle
Address
MAYO
Title
4/29/2021
DATE

Federal Communications Commission
Washington, DC 20554

Dear Sirs:

This will confirm that I am a regular listener to Radio Station WONG(AM), Canton, Mississippi and reside in the station's listening area. This will certify that WONG(AM) has been operating and broadcasting for at least the last six (6) months and has not been off the air during that time.

Keith B Warfield

Name

251 W. Peace St Canton MS

Address

Business Owner

Title

4-26-21

DATE

Federal Communications Commission
Washington, DC 20554

Dear Sirs:

This will confirm that I am a regular listener to Radio Station WONG(AM), Canton, Mississippi and reside in the station's listening area. This will certify that WONG(AM) has been operating and broadcasting for at least the last six (6) months and has not been off the air during that time.

Anthony Denton
Name

146 Daywood Drive
Address

Assistant
Title

4-30-21
DATE

CERTIFICATE OF SERVICE

I, Allan G. Moskowitz, Esq. do hereby certify that a copy of the foregoing "Reply To Opposition" was delivered via electronic mail this 30th day of May, 2021 to the following:

Mark Jones
mark@vicksburgv105.com

Alexander T. Sanjenis
Assistant Chief
Audio Division, Media Bureau
Federal Communications Commission
45 L Street, NE
Washington, DC 20554


Allan G. Moskowitz, Esq.