

Before the  
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in the Library of Congress  
Washington, D.C. 20559

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In re )  
 )  
Notice of Proposed Rulemaking ) RM 2008-7  
 )  
NOTICE AND RECORDKEEPING FOR USE OF )  
SOUND RECORDINGS UNDER STATUTORY )  
LICENSE )  
\_\_\_\_\_ )

**COMMENTS OF WONB RADIO**

WONB Radio, 94.9 FM, has been in operation for over 17 years on the campus of Ohio Northern University in Ada, Ohio, a small, rural community in West Central Ohio. WONB is professionally managed by one person and student operated, 365 days a year. We air approximately 30,000 public service messages a year for area non-profit organizations. In addition to the public service announcements, we air programming for specific minority audiences including gospel music; a local church service; and a weekly public affairs program.

WONB has been streaming on the internet for almost ten years. Throughout that time, we have obeyed all laws and requirements for streaming, paying our fees on time as obligated. Our internet audience is very small, perhaps 15 to 25 people at a time, primarily during sporting events and our weekly church service. Our web address is: <http://www.wonbradio.net>

We are an interested party because the proposed rule changes will affect the way in which we operate. The new proposed rulings concerning census reporting and the

requirement to report actual performances in lieu of ATH is an undue burden for WONB and other stations paying only the minimum fee (as we do) and we should be exempt from the proposed changes.

Many, if not all, college radio stations, similar to WONB, stream to small audiences. Our audience will never be larger than what it is now. By paying a minimal fee, we feel we have met the obligations of RIAA and Sound Exchange. The increase in documenting all of the music we play, year round, will cause us, and other stations, a hardship. We have a volunteer staff, without funding for assistance in documenting what we play or the time. If obligated to document all of our music, that is heard by fewer than 25 people an hour, we would have to consider ending our stream. And this, I feel, is a disservice to our audience.

Respectfully submitted,

WONB Radio

By: \_\_\_\_\_

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January 26, 2009