

**Grantshire Technologies, L.L.C.**  
**10805 Sunset Office Drive**  
**Suite 300**  
**Saint Louis, Missouri 63127**  
*1-866-360-7928 (Toll Free)*

Thank you for your opportunity to comment on your proposed rulemaking that would change the reporting requirements for services who pay royalties for the use of sound recordings to SoundExchange (37 CFR Part 370[Docket No. RM 2008-7]).

As a Manager and Member of Grantshire Technologies, L.L.C., I am in a unique position to address the issues raised by the proposed rulemaking. Grantshire Technologies, L.L.C. is the parent company of a small, family owned traditional broadcasting network which serves FCC Licensed AM and FM stations across the United States. It also operates Grantshire Artist Promotion and Management Services, L.L.C., which provides creative services, promotional services and complete management / representation services to individual musicians and bands (separately from our radio network operations). Our Limited Liability Company also operates a radio show syndication service which syndicates shows to both traditional radio stations and Internet broadcasters on a barter or fee basis. We also operate our own web hosting servers and offer website design and hosting services to our clients.

Grantshire Technologies, L.L.C. also operates the only Internet radio station which functions like a traditional F.C.C. licensed broadcaster - including live weather, emergency alerts, traffic updates and programming oriented to our local community combined with a Christian Hit Music format. Our Internet digital audio service (Internet radio station), The Journey™ has broadcast on the Internet since November 2, 2004 and is the only Internet station in the United States which holds membership in a regional broadcasters' association, The Missouri Broadcaster's Association (see attachment), and was the first accepted for affiliation with several traditional broadcast networks, who did not (or currently do not) accept affiliation with Internet broadcasters as a matter of policy<sup>1</sup>. Our Internet station is the only Internet broadcaster recognized by The State of Missouri, along with traditional, FCC licensed AM, FM and TV broadcasters (see attachment #2). Our Internet station, both un currently, pays royalties to SoundExchange through third-party services, such as Live 365, LoudCity and SWCAST. We provide a format not carried by traditionally licensed AM and FM stations in the Saint Louis, Missouri region, which we consider to be our "primary broadcast area" for purposes of marketing, network affiliation, emergency notifications, weather and news.

Our company has currently opted to use a service such as LoudCity, Live 365, or SWCAST because we do not have the in house staff to handle many of the reporting and documentation requirements and, although we have a large local audience (comparable at times to a traditional FCC licensed broadcaster in our market), it is more cost-effective to use a licensing service than to contract directly, and independently, with SoundExchange, either under the previous "small webcaster" license or currently as a large webcaster. The current fee structure of these services is also much more conducive to a small family business. To the best of my knowledge, both Live 365 and Loudcity provide song / performance monitoring and documentation services (or logs) to those digital audio services who opt to license directly through SoundExchange. In the case of Live 365, the digital audio service must use Live 365 as its streaming service provider in order to access these logs, where LoudCity apparently can work with any streaming provider as long as particular streaming provider sends the proper metadata<sup>2</sup>.

In our role as musical artist and musician managers, we see serious flaws in the current reporting system which, we hope, will be addressed by the Copyright Royalty Board in rulemaking.

I personally know of independent artists who received heavy Internet airplay on our own station and on other Internet stations as well, who were properly registered with SoundExchange yet received no compensation because SoundExchange did not have any record of airplay by Internet stations. In at least one case, of which I have personal and direct knowledge, the artist had paid the online digital audio

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<sup>1</sup> The Journey Internet Radio Station currently has affiliation agreements with Radio Netherlands (non-commercial), The Jubilee Radio Network (non-commercial religious programming serving traditional, FCC licensed stations), The Impact Radio Networks (commercial serving traditional, FCC licensed radio stations), Accent Radio Network, Pacifica Radio Network, Feature Story News Service and The Missouri Farm Bureau Network (commercial news), UNI/United News and Information (News and Religion), The Journey Radio Network (religious music and talk, commercial network serving FCC licensed AM and FM stations, flagship) and several others.

<sup>2</sup> Hardcopy of email from LoudCity, LLC dba LoudCity Networks. Date missing.

service, Live 365, to promote and distribute his recordings in digital format to its amateur online content providers, which it calls "Internet broadcasters" and to those professional digital audio services ("Internet Radio stations"), such as ours, who used the service as a streaming provider and the artist was even on Live 365's top played charts within the musical genre, yet SoundExchange showed no record of any airplay - no matter how small. Thus, we share the concern, from our own experience, of the Judges that, under the current system, some artists are under compensated or not compensated at all. I concur that the current system of estimating airplay is inadequate and at odds with the purpose of record keeping as defined within the statute.

On the surface, there are several issues which should be addressed when considering the Royalty Board Judges proposal that the reporting requirements be changed to year round consensus reporting. From the perspective of artists and labels, there is merit to such a proposal as it would eliminate under reporting or non-reporting of airplay due compensation as intended by the statute as the Judges note, which occurs using the current reporting system. That said, however, there are some problems with such a proposal from both a practical and technological perspective.

- 1.) The proposal, if adopted as the new requirement, would adversely affect syndicated programming containing musical works. Most syndicated programming is currently distributed via satellite, distributed on compact disc, delivered via private Internet streaming or via digital downloads. Such syndicated programming may be distributed as a single track or file or as several segments - each of which may contain multiple musical works from several musical artists, bands and/or labels. It is not possible, within the limits of current technology, to measure the exact number of performances of specific musical works within the individual file or segments which comprise the syndicated musical programming. At best, such programming can be tagged by show name and host and the number of streams tuned to each segment can usually be measured<sup>3</sup>. Syndicated shows can, and usually do, provide a playlist of the songs and artists used during the show, often with timing information to facilitate local spot placement. Since syndicated programming comes from a variety of sources, there is great variance in the information provided in each playlist. Some only contain the artist/band and song title while others contain complete album titles and/or the IRSC code information. Most of these syndicated programs are produced for primary distribution by traditional broadcasters rather than digital audio services and, therefore, the producers do not provide (and sometimes do not maintain) the required information which would be required by this change in rulemaking. Other syndicated programs are produced in Canada and other countries not covered by the jurisdiction of the U.S. Copyright Royalty Board and therefore may not contain the information that would be required under this new rulemaking even though such international programs may contain material entirely eligible for digital audio airplay within the United States.
- 2.) Another type of syndicated programming would be severely adversely affected by the proposed change in the reporting requirements - that of live news and public affairs programming. Many of these shows are produced primarily for broadcast by traditional FCC licensed AM and FM broadcast stations rather than by digital audio services, although such services such as The Journey, our "Internet Radio Station", may be contractually bound to carry such programming. As such, such programs may contain sampling or complete cuts of particular music licensed for airplay within the United States, but the network may not provide either because of technological or practical limitations or be unwilling to provide specific information about the musical work or works performed during the transmission of such live news and public affairs program, whether a regularly scheduled program or a live news special of breaking events. As mentioned above, it may be possible to provide the number of performances of the actual syndicated news program, but it is currently technologically not possible to provide the number of performances of specific musical works in such cases.

I respectfully suggest that, should the the Judges adopt their proposal for consensus reporting as a new rulemaking, that such rules contain exemptions for syndicated programming which recognizes the technological and practical limitations which digital audio service providers currently face while seeking a balance to protect the rights of the artists, bands, labels and composers. To prevent possible abuse and potential loopholes by some digital audio service providers, particularly some "Internet radio stations", I would suggest to the Judges, that digital audio services be limited to a specific number of hours per day or week of music oriented syndicated programming covered by such exemptions, perhaps no more than 10% of total programming hours per week. Since it is not technologically feasible to track performances of individual songs during such syndicated programming, perhaps the total number of performance per segment could be divided equally among the various artists/songs in each segment.

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3 Some commercial monitoring services, such as Radiowave Airplay Monitor, do not monitor streams to programming which its computers cannot identify as music. These services are more concerned with providing data about music charting and, as a secondary function, to provide music performance logs.

I would also suggest that should the Judges adopt this proposed rule change, that such a rule include an exception or exemption for network syndicated news and current affairs programming which may include song tracks and musical interludes. In such cases, it is often not technologically possible to measure performances of any included musical works and often is impossible to identify the performers, title, label or CD on which such musical tracks appear. Without such exceptions or exemptions, many quality public interest programs will no longer be available to the communities online, and perhaps not through local traditional broadcasters, because, in my 25+ years experience in traditional broadcasting, it is most often these programs that make use of filler musical tracks which would fall under the preview of the statute. The loss of these programs online would not be in the public interest.

3.) Non-Interactive digital audio services, such as "Internet radio" use a number of technological schemes to deliver our content. Not all of these are equally robust. The technology and abilities of each of these delivery mechanisms varies widely from one to another. The Judges ask what further improvements can be made to the reporting mechanisms because newly available software or substantially reduced costs for certain delivery mechanism alternatives since the promulgation of the interim regulation. For many digital audio services, on the Internet, at least, commonly called "Internet Radio", improvements have focused on the quality of streaming audio at lower speeds or with smaller technological "footprints", rather than on the mechanisms used for reporting. There are numerous common streaming formats in use, the most common being Shoutcast and Icecast, followed by Real Networks' Realplayer and Microsoft's Windows Media. There are other common formats as well. These are, for the most part, old technology that was in at the time of the promulgation of the interim regulations. In many cases, the logs do not have the ability to provide, in an easy to extract format, the data required by the regulations. By way of example, I provide a section of an actual Shoutcast log since Shoutcast is one of the most commonly used delivery methods for non-Interactive digital audio services on the Internet (commonly known as "Internet Radio").

```
<01/29/09@19:38:10> [dest: 67.78.3.54] connection closed (0 seconds) (UID: 712)[L: 1]{Bytes: 37789}(P: 1)
<01/29/09@19:38:10> [dest: 67.78.3.54] starting stream (UID: 713)[L: 2]{A: NSPlayer/9.0.0.4503 WMFSDK/9.0}(P: 1)
<01/29/09@19:38:10> [dest: 67.78.3.54] connection closed (1 seconds) (UID: 713)[L: 1]{Bytes: 50929}(P: 1)
<01/29/09@19:38:11> [dest: 67.78.3.54] starting stream (UID: 714)[L: 2]{A: NSPlayer/9.0.0.4503 WMFSDK/9.0}(P: 1)
<01/29/09@19:41:05> [yp_tch] yp.shoutcast.com touched!
<01/29/09@19:49:44> [dest: 212.72.165.30] starting stream (UID: 715)[L: 3]{A: WinAMP}(P: 2)
<01/29/09@19:49:45> [dest: 212.72.165.30] connection closed (1 seconds) (UID: 715)[L: 2]{Bytes: 22997}(P: 2)
<01/29/09@19:51:05> [yp_tch] yp.shoutcast.com touched!
<01/29/09@20:01:06> [yp_tch] yp.shoutcast.com touched!
<01/29/09@20:04:47> [dest: 212.72.165.30] starting stream (UID: 716)[L: 3]{A: WinAMP}(P: 2)
<01/29/09@20:04:47> [dest: 212.72.165.30] connection closed (1 seconds) (UID: 716)[L: 2]{Bytes: 22997}(P: 2)
<01/29/09@20:11:06> [yp_tch] yp.shoutcast.com touched!
<01/29/09@20:19:45> [dest: 212.72.165.30] starting stream (UID: 717)[L: 3]{A: WinAMP}(P: 2)
<01/29/09@20:19:46> [dest: 212.72.165.30] connection closed (0 seconds) (UID: 717)[L: 2]{Bytes: 22997}(P: 2)
<01/29/09@20:21:07> [yp_tch] yp.shoutcast.com touched!
<01/29/09@20:31:07> [yp_tch] yp.shoutcast.com touched!
<01/29/09@20:34:43> [dest: 212.72.165.30] starting stream (UID: 718)[L: 3]{A: WinAMP}(P: 2)
<01/29/09@20:34:43> [dest: 212.72.165.30] connection closed (0 seconds) (UID: 718)[L: 2]{Bytes: 22997}(P: 2)
<01/29/09@20:41:07> [yp_tch] yp.shoutcast.com touched!
<01/29/09@20:49:42> [dest: 212.72.165.30] starting stream (UID: 719)[L: 3]{A: WinAMP}(P: 2)
<01/29/09@20:49:43> [dest: 212.72.165.30] connection closed (1 seconds) (UID: 719)[L: 2]{Bytes: 22997}(P: 2)
<01/29/09@20:51:08> [yp_tch] yp.shoutcast.com touched!
<01/29/09@21:01:09> [yp_tch] yp.shoutcast.com touched!
<01/29/09@21:04:42> [dest: 212.72.165.30] starting stream (UID: 720)[L: 3]{A: WinAMP}(P: 2)
```

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<01/29/09@21:04:42> [dest: 212.72.165.30] connection closed (1 seconds) (UID: 720)
[L: 2]{Bytes: 22997}(P: 2)
<01/29/09@21:11:10> [yp_tch] yp.shoutcast.com touched!
<01/29/09@21:19:46> [dest: 212.72.165.30] starting stream (UID: 721)[L: 3]{A:
WinAMP}(P: 4)
<01/29/09@21:19:47> [dest: 212.72.165.30] connection closed (0 seconds) (UID: 721)
[L: 2]{Bytes: 22997}(P: 4)
<01/29/09@21:21:11> [yp_tch] yp.shoutcast.com touched!
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Much of the technology in place is International in scope and has not been designed with these regulations in mind. Various audio digital services employ schemes to monitor the number of performances and to correlate these with the musical works which fall under the statues under discussion. Not all delivery methods work with all schemes nor work equally well. The logs maintained by many of these systems do not import well into the formats required by SoundExchange and must be translated through a labor intensive process. Some of the more common monitoring approaches also fail to provide a truly accurate log of performances because of how they monitor. The scheme employed by Radiowave Airplay Monitor, for example, a commercial monitoring company for Internet radio stations (Internet digital services) counts each IP address as a single "listener" (performance) even if multiple sources login to the digital audio source. This results in inaccurate, underreporting when multiple listeners may access the digital audio source from a single static IP address behind a commercial firewall, such as many corporate environments, college and university campuses and apartment buildings<sup>4</sup>. Of the services which monitor streams, in my experience, several over report and several under report when compared with our internal live monitoring of our performance activity. Our in house live monitoring does not currently allow us to maintain a log file correlating "listeners" (number of performances) specific musical tracks or to maintain logfiles which could be converted into an acceptable format for reporting purposes. As mentioned earlier, our company employs external contractors to provide that function. Several software programs are available which can provide data depending on the digital audio delivery method used and these vary widely in terms of price, features and ease of meeting the reporting requirements.

Depending on the digital audio delivery systems used, in-house automatic data collection may or may not be feasible and may or may not be costly. In the case of Internet streaming, most stream hosting providers routinely provide information about "listeners" (performances) to their clients, but most do not provide the detailed information or complete information as would be required by these changed regulations.

In my opinion, the problem is not that such information could not be easily provided by most streaming host providers to those who provide digital audio services on the Internet, for example, but that there is no standard enforcement agency, like the FCC in domestic radio and television broadcasting, who can mandate and enforce transmitter standards and that stream host providers and software developers have not made ease of reporting and integration a priority. The fact that LoudCity and Live 365 provide such information to their clients routinely is an indication that such services can be provided.

Another issue faced by those who provide digital audio services on the Internet, such as we do, is that many of the automation systems in common usage do not send all the detailed metadata to the streams or to a logfiles in formats that are easily convertible to SoundExchange's current requirements and, in many cases, do not store all information in formats easily exportable to the limited options currently offered by SoundExchange. Many of the newest automation software packages will export information about music tracks to Excel or other spreadsheet programs and many of these software packages, at least in the professional editions for commercial radio use, will report artist, title, album or CD information as well as the ISRC code providing that the digital audio service provider has entered the information into the database, but since the automation software is usually separate from the digital content delivery system, the "performance" information still needs to be manually correlated based on server logs if relevant information is not reported by the delivery system software itself, streaming provider or third-party monitoring company.

For many digital audio services serving the Internet, complying with these new requirements may be simply too labor intensive or too expensive given tight budgets and small staff, at least given the many diverse technologies used in content delivery and the lack of consistent industry-wide standards. For smaller Internet-based non-interactive digital media services (with limited budgets), and perhaps for those with large audiences, but few employees, LoudCity, Live 365 and SWCAST may be appropriate alternatives to direct licensing with the various licensing organizations. However, these may be effective alternatives if their pricing structure, which apparently is based on the current reporting and royalty structure, is affordable to those small businesses (and individuals) who make use

<sup>4</sup> Personal emails from support@radiowavemonitor.com, 2007 and 2008.

of their services.

Given the current national and international economic situation, I would encourage the Judges to consider delaying any new rulemaking which would place additional burdens on small businesses in these times of increasingly tight budgets, employee layoffs, and dwindling revenue from in-stream commercials, web advertising and other projects. Perhaps an incremental increase in reporting frequency prior to full consensus reporting would be appropriate and could serve the needs of the artists, bands and labels and those who operate as smaller digital audio services. For many artists and bands, including our clients, Internet and other digital audio services are important promotional outlets which are not easily duplicated by traditional FCC licensed broadcasters and other venues. It does our artists and bands no good if the digital audio services which promote them cease operations because fees or operations become too costly and labor intensive.

Although I prepared an answer to the Judge's questions about website security and technology, I believe this goes beyond the scope of my personal professional expertise and is better addressed by IT professionals. I have requested that our IT Director, Michael Gingerich file comments on this matter.

Respectfully yours,

(Rev.) Robert A. Weiter  
Director of Traditional Broadcast Services  
Member (one of the owners)  
Grantshire Technologies, L.L.C.  
10805 Sunset Office Drive  
Suite 300  
Saint Louis, Missouri 63127

General Manager and Director of Traditional Broadcast Services  
The Journey Radio Network, L.L.C.  
9051 Watson Road, #235  
Saint Louis, Missouri 63126

1-866-360-7918

January 23, 2008

Attachments



Here you can see all of the information about this member that you have permission to view. Swiftly navigate through other profiles using the "Next Page" and "Previous Page" buttons. [Login](#)  
 Directory > View Search Profile

**VIEW PROFILE - The Journey** [Return to results](#)

[Profile](#) [Profile](#)

Profile 1 of 1

**Contact Name:** The Journey  
**Station Call Letters:** The Journey  
**AM/FM/TV:** AM, FM  
**Mailing Address:** 9051 Watson Road #235  
**Mailing City, State Zip:** St. Louis, MO 63126  
**City:** St. Louis  
**County:** St. Louis City, St. Louis County  
**State:** MO  
**Website:** <http://www.thejournevradio.org>  
**General Manager:** Rev. Robert Weiter  
**Station Format:** Internet Network - Christian Hit Music  
**Frequency/Channel:** Online  
**Area Coverage:**  
**Phone Number:** 866.360.7918  
**Fax Number:** 314.667.3253  
**Corporate:** Grantshire Technologies, LLC  
**Corporate Contact:**  
**Corporate Address:**  
**Corporate City, State, Zip:**  
**Group:** Member  
**Missouri House:** 57, 58, 59, 60, 61, 63, 64, 65, 66, 67, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 91, 92, 93, 94, 95, 96, 97, 100, 105, 108  
**Missouri Senate:** 1, 4, 5, 7, 13, 14, 15, 24, 26  
**Market Size:** Large Market ●

Contact Administrator ✉

powered by memberclicks

934 OFFICIAL MANUAL

Address: 1750 S. Brentwood Blvd., Ste. 811, St. Louis 63144  
Telephone: (314)-961-1320 / FAX: (314)-961-7562  
[www.bottradionet.com](http://www.bottradionet.com)  
Corporate: Bott Radio Network  
General / Operation / Station Manager: Mike McHardy

**KSLZ/FM**  
107.7 mhz.  
Format: CHR  
Address: 1001 Highlands Plaza Dr. W., Ste. 100, St. Louis 63110  
Telephone: (314)-333-8000 / FAX: (314)-333-8100  
Corporate: Clear Channel Radio  
General Manager: Dennis Lamme

**KTRS/AM**  
550 khz.  
Format: News / Talk / ABC  
Address: 638 W. Port Plaza, St. Louis 6(314)6  
Telephone: (314)-453-5500 / FAX: (314)-453-9704  
[www.ktrs.com](http://www.ktrs.com)  
Corporate: St. Louis Sports Radio  
President / General Manager: Tim Dorsey

**KWMU/FM**  
90.7 mhz.  
Format: News / Talk / Information / NPR / PRI / APM  
Address: One University Blvd., St. Louis 63121  
Telephone: (314)-516-5968 / FAX: (314)-516-5993  
[www.kwmu.org](http://www.kwmu.org)  
E-mail: [kwmu@kwmu.org](mailto:kwmu@kwmu.org)  
Corporate: University of Missouri-St. Louis  
Director / General Manager: Patricia Wente

**KWUR/FM**  
90.3 mhz.  
Format: College Underground Radio  
Address: PO Box 1205, Washington University, One Brookings Dr., St. Louis 63130  
Telephone: (314)-935-5952 / FAX: (314)-935-5699  
General / Station Manager: Katherine Covell

**KYKY/FM**  
98.1 mhz.  
Format: Hot AC  
Address: 3100 Market St., St. Louis 63103  
Telephone: (314)-531-0000 / FAX: (314)-531-9810  
[www.y98.com](http://www.y98.com)  
Corporate: CBS Radio  
Program Manager: Mark Edwards

**The Journey**  
Internet Radio Network  
Format: Christian  
[www.thejourneyradio.org](http://www.thejourneyradio.org)  
E-mail: [info@thejourneyradio.org](mailto:info@thejourneyradio.org)  
Address: 9051 Watson Rd. #235, St. Louis 63126  
Telephone: (314)-431-5210 / FAX: (314)-754-9754  
General Manager: Rev. Robert Weiter

**WARH/FM**  
106.5 mhz.  
Format: Adult Hits  
Address: 11647 Olive Blvd., St. Louis 6(314)1  
Telephone: (314)-983-6000 / FAX: (314)-983-6970  
[www.1065thearch.com](http://www.1065thearch.com)  
Corporate: Bonneville International Corporation  
President: Bruce T. Reese

**WCBW/AM/FM**  
880 khz. / 89.7 mhz.  
Address: 13063 Winu Dr., Highland, IL 62249  
Telephone: 619-654-7521/(314)-421-3020  
FAX: (618)-654-6333  
Corporate: New Evangelistic Center, Inc  
Station Manager: Reid Shaylor

**WDID/AM**  
1510 khz.  
Address: 13063 Winu Dr., Highland, IL 62249  
Telephone: (618)-654-6880 / FAX: (618)-654-6333  
Corporate: New Evangelistic Center, Inc  
Station Manager: Reid Shaylor

**WFUN/WHHL**  
95.5 mhz. / 104.1 mhz  
Format: R&B / Hip-Hop  
Address: 9666 Olive Blvd., Ste. 610, St. Louis 63132  
Telephone: (314)-989-9550 / FAX: (314)-989-9551  
[www.foxy955.net](http://www.foxy955.net) / [www.hot104stl.com](http://www.hot104stl.com)  
Corporate: Radio One, Inc.  
General Manager: Michael Douglas

**WGNU/AM**  
920 khz.  
Format: News / Talk / Radio America - USA Radio Network  
Address: 265 Union Blvd., Ste. 1315, St. Louis 63108-1262  
Telephone: (314)-454-6660 / FAX: (314)-454-6609  
Corporate: Norman Broadcasting Company  
General Manager: Esther Wright

**WIL/AM/FM**  
1430 khz. / 92.3 mhz.  
Format: Classic Country / Country  
Address: 11647 Olive Blvd., St. Louis 63141  
Telephone: (314)-983-6000 / FAX: (314)-983-6970  
[www.legends1430.com](http://www.legends1430.com) / [www.wii92.com](http://www.wii92.com)  
Corporate: Bonneville International Corporation  
President: Bruce Reese

**WMVN/FM**  
101.1 mhz.  
Format: Rhythmic AC  
Address: 11647 Olive Blvd., St. Louis 63141  
Telephone: (314)-983-6000 / FAX: (314)-983-6970  
[www.movinstlouis.com](http://www.movinstlouis.com)  
Corporate: Bonneville International Corporation  
President: Bruce Reese

**St. Robert**

**KFLW/FM**  
98.9 mhz.  
Format: Waitt Radio Network / Hot AC  
Address: 555 Marsha II Dr., St. Robert 65584  
Telephone: (573)-336-5359 / FAX: (573)-336-7619  
[www.kflw989.com](http://www.kflw989.com)  
Corporate: Ozark Media, Inc.  
General Manager: Tracy O'Quinn

**Steelville**

**KNSX/FM**  
93.3 mhz.  
Format: Adult Alternative  
Address: 12444 Towerscourt Dr., Ste. 365, St. Louis 63131 or PO Box 93, St. Peters 63376  
Telephone: (314)-965-9330  
Corporate: Twenty-One Sound Communications  
General / Station / Program / Sales / Office Manager: Ruth Choate

**Stockton**

**KRWP/FM**  
107.7 mhz.  
Format: Classic Hit Country / Jones Radio  
Address: PO Box 1070, 1225 South St., Ste. B, Stockton 65785  
Telephone: (417)-276-5253 / FAX: (417)-276-2255  
Corporate: Cumulus Broadcasting  
General Manager: Lance Bearner

