RIC Received & Inspected
OCT 15 2012
FCC Mail Room

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In Re Application of:	)	
	)	
SEWARD MEDIA PARTNERS, LLC, Assignor	)	BAL-20120502ACF
	)	Facility ID 72209
	)	
KENAI EDUCATIONAL MEDIA, INC., Assignee	)	
	)	
For Assignment of License of	)	
for Station KSEW, Seward, Alaska)		

To: The Secretary
Attn: Chief, Audio Division, Media Bureau

INFORMAL OBJECTION

Northern Radio, Inc. ("NRI"), by its undersigned attorney objects to grant of the above reference application for the following reasons:

1. The application was filed without a filing fee with the claim that the applicant is exempt as a "noncommercial licensee." However, the "applicant'" and "Licensee" Seward Media Partners is a commercial entity. The fact that the propsed assignee is noncommercial does not exempt the commercial applicant and "Licensee" from paying the required filing fee.

2. The agreement for sale does not state the consideration being paid for the assignment of licenses which is a requirement, the Commission having expressly ruled that the consideration may not be "redacted" from the copies of agreements for assignment submitted with applications and placed in public files. Omitting mention of the consideration from the agreement for sale as the parties here have done is the same as "redacting" it.

NRI has standing to file this objection as it is a creditor of Assignor and all of the station's assets, including the proceeds from the sale of the station's license, have been pledged as security for the Assignor's debt to NRI.

RESPECTFULLY SUBMITTED,

David Tillotson
Law Office of David Tillotson
4606 Charleston TER NW
Washington, DC 20007
Email: dtlaw67@starpower.net
Attorney for Northern Radio, Inc.

October 11, 2012

CERTIFICATE OF SERVICE

I, David Tillotson, do hereby certify that a copy of the foregoing Informal Objection has been sent via first class United States mail, postage pre-paid, this 12th day of June 2012, to:

KENAI EDUCATIONAL MEDIA, INC.
PO BOX 1825
Seward, AK 99664

Seward Media Partners, LLC
PO BOX 2414
Seward AK 99664

David Tillotson

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