

Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

ATTN: Peter D. Saharko, Attorney Advisor  
Video Division, Media Bureau

RE: Notice of Apparent Liability for Forfeiture  
KTGF License Corporation  
Facility ID # 13792  
NAL/Acct. 201441420021  
FRN: 0021402961

July 30, 2014

Dear Secretary:

In regards to the above-referenced NAL, the Licensee, KTGF License Corporation, asks the FCC's consideration of facts which we believe are relevant to resolving this matter.

In its Notice, the FCC notes that the Licensee "*apparently willfully and/or repeatedly violated the Commission's Rules*". It noted that the Licensee:

- 1) Failed to file timely the FCC's Form 398, Children's Television Programming Reports
- 2) Failed to report this violation in its license renewal application, which was filed in November, 2013

The Licensee admits that it did fail to file the Children's Television Programming Reports in a timely manner, and that it did not report this on its license renewal application. The Licensee does not dispute that it is reasonable for the FCC to assess a fine for these omissions.

But, the Licensee asks that as the Commission determines the appropriate forfeiture, consideration be given to the following facts:

- 1) The omissions noted above were not willful or deliberate, but were errors made by the Licensee as it began to operate KTGF under unanticipated challenging circumstances.

The Licensee acquired KTGF on March 14, 2012. The previous owner of the station had experienced severe financial trials and by the time KTGF License Corporation took ownership of the station the studios and offices had been dismantled, transmitting equipment was operable but in a state of disrepair, and other serious and immediate issues were present.

It was the goal of KTGF License Corporation to correct these urgent issues promptly, and the focus of management was shifted to getting that done and operating KTGF in the public interest and in compliance with FCC Rules.

In the process, though KTGF did in fact air children's programming in accordance with FCC Rules, the management of KTGF failed to timely file the FCC Forms 398 for the first several quarters of its operation of KTGF.

- 2) Once this situation was discovered, management took immediate action to correct the situation, filed the reports for previous quarters, and has timely filed all of its FCC Forms 398 and other required FCC filings ever since.

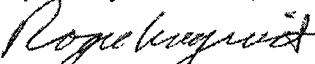
The Licensee also created a calendar of required FCC filings to ensure that a problem of this nature will not occur in the future.

- 3) The Licensee is a small, locally-owned, community broadcaster which does not own any other TV stations or business interests.

While the Licensee does not dispute that it is reasonable that it should pay a forfeiture to the FCC, it asks that the FCC consider that it is operating the Station without a major network affiliation in one of the smallest Designated Market Areas in the country (Nielsen DMA #191) and that a reduction the initial NAL amount of \$9,000 would seem appropriate in light of the circumstances noted in this response.

Please direct any questions concerning this matter the undersigned at (406) 949-4308, or PO Box 7393, Helena, MT. 59604-7393.

Respectfully Submitted,

  
Roger Lonnquist  
President  
KTGF License Corporation