

June 15, 1978

Statement of FCC Commissioner James H. Quello
In Re: Renewal of Licenses for KNEW, Oakland Cal. and
KSAN, San Francisco California

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While I approve of the result reached in this case I continue to be concerned over the policy of the Commission majority to find "standing as a party in interest" on a minimal showing. Petitioner fails to allege in its petition to deny that any one of its members are listeners of either KSAN or KNEW. Such omission in my opinion, is fatal. Additionally, petitioner does not meet the judicial standard of representing "broad as distinguished from narrow interests!" United Church of Christ v. FCC, 7 Pike & Fischer RR 2d, 2001, 2013 (DC Cir. 1966). Petitioner states that it concerns itself with black employment only, thus excluding public interest aspects of other significant minority categories. Thus, petitioner appears to represent specific narrow interests by its own admission, as contrasted to the judicial standard of "broad interests."

My views on the matter of standing were recently expressed in detail in McCormick Communications Inc. (WEZE), Boston, Massachusetts, application to assign license. ___FCC 2d___ (FCC 1978-176). I incorporate by reference those views herewith.