

Ben Allen  
WRFL – UK Student Radio  
University of Kentucky

203 Student Center  
Lexington, KY 40506

To the Copyright Royalty Board,

My name is Ben Allen and I am the Media Advisor for the Office of Student Involvement at the University of Kentucky, overseeing operations at the university's student managed radio station, WRFL 88.1 FM.

I am writing to express WRFL's agreement with the terms negotiated by College Broadcasters, Inc. and SoundExchange and published in the Federal Register on November 5, 2014. I believe that these terms best represent WRFL's interests and the interests of student radio, in general, as they have served us sufficiently since they were last negotiated. WRFL's 24/7 live programming format and our playlist record-keeping equipment does not allow for compliance with the recordkeeping regulations proposed. The negotiated terms allow us to comply with the regulations and provide artists the royalties they deserve while preventing us from having to drastically change our format and recordkeeping methods. Such a change would create a huge cost to us as well as a full overhaul of our training program for students. Thus, we stand in favor of the negotiated terms.

WRFL believes strongly that the agreement negotiated between CBI and SoundExchange offers the best option for setting statutory terms and rates for non-commercial webcasters in awarding royalties to artists. We encourage the CRB to approve the settlement and adopt the regulations as negotiated.

Thank you for the allowing us this opportunity to express our views on this matter.

Ben Allen  
WRFL Media Advisor  
203 Student Center  
University of Kentucky  
Lexington, KY 40506  
[ben.allen3@uky.edu](mailto:ben.allen3@uky.edu)  
Office - (859) 257-3273  
Fax - (859) 323-4686  
Cell - (859) 333-5259