

**SEPARATE STATEMENT OF
KEVIN J. MARTIN
APPROVING IN PART, CONCURRING IN PART**

*Re: Entercom Kansas City License, LLC, Licensee of Station KQRC(FM),
Leavenworth, KS, and Entercom Wichita License, LLC, Licensee of Station KFH(AM),
Wichita, KS, Notice of Apparent Liability for Forfeiture (September 22, 2004)*

Consistent with my past statements, I believe we should be fining broadcasters on a “per utterance” basis.¹ In this instance, we could have found several violations within the broadcasts at issue and therefore could have assessed a larger fine.

¹ See, e.g., Separate Statement of Commissioner Martin, *Infinity Broadcasting Operations, Inc., Licensee of Station WKRK-FM, Detroit, Michigan*, Notice of Apparent Liability, 18 FCC Rcd. 6915, 6939 (2003) (urging the Commission to fine violators “per utterance”).