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July 27, 2020

RE: Demand to Cease Broadcasting the False Advertisement Sponsored by NRSC

Dear Station Manager:

This firm represents Pioneer Technical Services. Your station is currently broadcasting an advertisement by the National Republican Senatorial Committee (NRSC) that is false, misleading and deceptive. The advertisement defames Pioneer Technical Services, which is a highly respected engineering firm based in Butte, Montana.

As I am sure you are aware, broadcasters cannot air independent campaign advertisements that violate the “public trust” granted to you by your license. You have a duty “to protect the public from false, misleading or deceptive advertising.” *Licensee Responsibility With respect to the Broadcast of False, Misleading or Deceptive Advertising*, 74 F.C.C. 623 (1961).

Failure to prevent the airing of “false and misleading advertising” may be “probative of an underlying abdication of licensee responsibility” and can be cause for the loss of a station’s license. *Cosmopolitan Broad. Corp. v. FCC*, 581 F.2d 917,927 (D.C. Cir. 1978). You cannot violate the public trust you are mandated federally to uphold; you must serve the “public interest.”

The advertisement falsely asserts that as Governor, Steve Bullock “steered” business to Pioneer and blatantly suggests that Governor Bullock has done so to benefit his brother, Bill Bullock. This is false. Pioneer employs over 150 Montanans and has been recognized nationally for engineering excellence. The contracts it has to perform work for Montana were awarded through the normal state competitive process because of Pioneer’s track record of excellent work and its sterling reputation.

Bill Bullock was one of the founding members of Pioneer Technical Services in 1991 --- long before Steve Bullock held any elected office in Montana. Bill Bullock resigned as CEO of Pioneer in 2004. He and other shareholders in Pioneer sold their interests in the company in

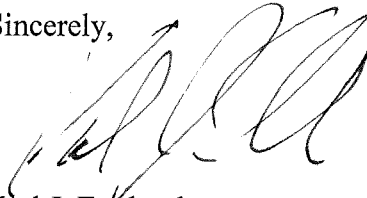
2009 – four years before Steve Bullock was elected Governor. Since then, Pioneer has been an employee-owned company.¹

Bill Bullock became Chairman of the Board of Directors of Pioneer in February 2017. Beginning in 2018, he and other members of the Board have been paid a stipend of \$1,500 to cover expenses and time for participating in quarterly board meetings. Apart from that modest stipend, Bill Bullock receives no income or distributions from Pioneer of any kind whatsoever.

The NRSC advertisement disparages the reputation of Pioneer Technical Services. If you continue to broadcast the advertisement, you will be exposing your station to a potential lawsuit for defamation. Accordingly, on behalf of Pioneer Technical Services and its employees and owners, we demand that you immediately cease and desist from any further broadcasts of the false and defamatory advertisement sponsored by the NRSC.

Please confirm that you will discontinue any further broadcasts of the false advertisement.

Sincerely,

A handwritten signature in black ink, appearing to read 'Karl J. Englund', written over a light blue horizontal line.

Karl J. Englund

¹ The shareholders who sold their interests became creditors of Pioneer, and their notes were fully paid off by about 2014.