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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the matter of	)	
	)	
Amendment of Part 73 of the	)	Petition for Rulemaking
Commission's Rules to amend	)	RM-9208
Subparts A, B and C to provide	)	
for very localized and/or	)	Report No. 2254
specialized broadcast service	)	

To: The Commission

COMMENTS OF MICHAEL R. REYNOLDS

I. INTRODUCTION

These comments are respectfully submitted in response to the Petition for Rulemaking in the above-captioned proceeding.

I have a substantial interest in this proceeding.

I am owner of the WOKIE Satellite Radio Network which relays nightly programs on space satellite SBS-6. I am an advanced class amateur radio licensee for thirty nine years. I was a Navy morse code operator at the Naval Communication Station on Guam. My Navy rank was Communications Technician, Radio Branch, 2nd Class.

I would like to legally provide a localized microbroadcast service within the boundaries of my city council district.

II. BACKGROUND

There are small community and neighborhood public information broadcast needs that are not being served due to the current FCC regulatory environment. There are, however, numbers of individuals who wish to lawfully operate a very localized microbroadcast service to the public. Because of the very high costs involved in obtaining a broadcast license and because of the fact that the FCC refuses to grant ANY new broadcasting licenses with less than 100 watts power, those individuals have no legal broadcast voice in their small community or neighborhood.

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### III. DISCUSSION

RM No. 9208 calls for the FCC to designate one AM and one FM channel for a microbroadcast service for the purpose of providing very localized and/or specialized broadcast service to the public. The request for rulemaking proposes that such service be restricted to one watt or less, low antenna height with licensing on a first come, first served basis, minimum operating schedule and minimum technical requirements.

This proposal is excellent in its overall intent but lacking in its implementation.

What the Commission should do is totally DE-REGULATE ALL microbroadcaster emitters operating within the AM and FM broadcast bands. The proposal for licensing and minimum operating schedules just adds needless and costly federal bureaucracy. If the FCC feels that it ABSOLUTELY MUST regulate ALL intrastate microbroadcasters then only the following rules should be considered:

1. Emissions will be permitted only in the FM or AM broadcast bands.
2. All transmissions to be discontinued immediately by the microbroadcaster if interference occurs to ANY FCC licensee on their FCC assigned frequency.
3. Station identification using the telephone number of the microbroadcaster to be transmitted in voice or morse code on or near the hour.
4. Power to be no greater than 15 watts.

### IV. CONCLUSION

Any idea of DE-REGULATION of microbroadcasting WILL cause an immediate wailing by large corporate absentee high power station owners, their NAB lobbyists and entrenched FCC bureaucrats.

If the Commission however has the backbone to determine that a diversity of voices must have a fair chance to be heard in local communities and neighborhoods then DE-REGULATION of microbroadcasting must begin.