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Concerning Rulemaking Number- RM-9208

Respectfully Submitted By-
David Solomon
1409-A West Fourth Street
Winston-Salem, NC 27101

On This Date-
February 22, 1998

Enclosed is one (1) original and nine (9) duplicates of "The Formal Comments of David Solomon Concerning RM-9208." Please circulate the extra copies among the Commissioners when this issue comes to table.

If you have any questions, please don't hesitate to call me at (336) 631-8392.

Sincerely,



David C. Solomon

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Before
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David Solomon
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Winston-Salem, NC 27101

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Formal Comments of David C. Solomon Concerning RM-9208

I am in sincere support of the recent Petition for Rulemaking, RM-9208, requesting that a low-power radio service be established and allowed to commence operations in Reston, Virginia. A service such as this is, in my view, well within the public interest for many obvious reasons.

- 1- It enables a substantial audience to be served by a very local and immediate information service.
- 2- It provides small businesses with an advertising vehicle they can afford.
- 3- Simulcasting on a low-power FM service could be the solution to many problems suffered by AM stations.
- 4- It could be helpful in enabling many career broadcasters to become owners of their own stations.
- 5- With more signals in any particular market, more people would receive service catered to their particular group (*ie- Asian, Hispanic, sight-impaired programming*).
- 6- More public and civic activities would receive coverage on the air.

The process of regulation would be very easy, since it would only require changing the current rules to allow local program origination on low-power FM translator stations. The current rules provide a maximum time limit of :30 seconds per hour during a normal schedule

A service such as this, provided by responsible, licensed citizens would only be a positive source of information and entertainment for many neglected population groups nationwide. From a localized inner-

city station that targets low-income households -to a station that serves a rural community with agricultural reports, the benefits far outweigh the detriment.

To ensure that varied voices be allowed access to a low-power radio service, licensing qualifications should not include any licensee of a full-power station. This would ensure that the filing process would not quickly leaving the hands of the mid-income entrepreneur.

- 1- Current full-power radio licensing procedures are financially out of reach to *most of the population*.
(ie- \$2,000 for FM construction permit application, regulatory fees)
- 2- As a result advertising rates on radio exceed the budget of the many *small businesses*.
- 3- News and informational views of the American media appear left only to *wealthy corporate viewpoints*.
- 4- Current licensing procedures for full-power radio stations handicap the public listening audience from receiving a large selection of varied programming. The number of different licensees is dwindling.
- 6- Without a low-power service, we'll continue to inhibit the delivery of local news concerning many rural towns and "bedroom communities."

I'm hopeful that, in it's wisdom, the Commission will find it not only in the public interest, but a *dire public need* to enable the currently unused spectrum in the AM & FM bands to become a new low-power radio service. A service like this would not cause harmful interference to existing broadcasters, yet it would provide attention to the true interest of the public as a whole- to get better service from the media...only worthy competition can deliver that.

Sincerely,



David C. Solomon
1409-A West Fourth Street
Winston-Salem, NC 27101
(336) 631-8392