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From: Frieda Werden, producer

To: FCC
Office Of the Secretary
Room 222
1919 M. Street NW
Washington, DC 20554

Re: Comments on RM-9208

I am the author of a forthcoming book on radio broadcasting for women, and I have long viewed micro broadcasting as one of the communications options most totally appropriate for use by women and girls.

In order to make this broadcasting niche most inviting to a broad range of female participants, I propose the following additions and revisions to the Leggett filing, which I believe would make the rules best emphasize localism, volunteerism, responsibility to neighbors, and a noncompetitive spirit.

(1) That micro broadcasting shall be known as neighborhood broadcasting.

(2) That neighborhood broadcast licenses be restricted to ONE, not FIVE per owner.

(3) That neighborhood broadcast licenses be solely available to individuals or groups of individuals that reside within the neighborhood broadcast area for which they are licensed.

(4) That no commercialism be permitted on neighborhood radio, and that neighborhood radio not be used by or for commercial entities (such as real estate firms, to sell houses in the neighborhood, or bars to attract patrons).

(5) That the mission of neighborhood radio shall include but not be limited by statute to discussing issues of importance to the neighborhood.

(6) That a neighborhood radio broadcasting license may be revoked by a petition signed by 56% of the persons living in the prescribed broadcast area, and that the signatures on these petitions must be validated by a local authority (such as a magistrate's court or city council commission) before submission to the FCC.

(7) That whether or not multiple frequencies are available in a neighborhood, these frequencies must be shared by all applicants. That competing licensees be required to mediate their own time-sharing agreements. That where there are competing licensees meeting a filing deadline, no license shall be granted until a notarized time-sharing agreement signed by all parties is filed. And repeated violations of time-sharing agreements shall be grounds for revocation of license.

(8) That license renewal shall come up every two years, at which time any new competitors must be added to the time-sharing agreement.

(9) That no less than 50% of neighborhood broadcast time allotments shall go to women and girls, and that if there are insufficient women and girls applying to occupy the airtime, then their unfilled percentage of the hours shall be held vacant until women and girls are able to fill them.

I have engaged in considerable discussion of these proposals with other interested parties. I met some resistance to the idea of a purely non-commercial license, but I feel very strongly that (a) commercialism gives an incentive to creeping monopolization of a broadcasting resource and tends to determine both the pattern of time use and the content, to the detriment of serious, experimental, or friendly/casual usage; and (b) I am personally sick to death of being nagged to buy things at every turn -- on my e-mail, in my postal box, with fliers in my door, on TV and radio, with billboards -- etc. ad infinitum. We also find here in my community, Austin, that there is far too little non-commercial

airtime available in the reserved FM band for the local concerns of the community. We do have cable access channels on TV, but the skills needed to operate this medium and the ego required to participate are greater than for neighborhood radio. And neither of these media is targeted at the neighborhood level. Furthermore, (c) keeping neighborhood radio noncommercial and also mandatorily local-controlled is a substantial barrier to its becoming just another wavelength for existing franchises.

Naturally some of the the largely male group currently running pirate micro stations are horrified by the idea of a reservation for females, but it has been my experience that when there is competitive jockeying for airtime on radio stations, whether commercial or noncommercial, women and girls tend to back off because they don't need the grief. Not many women are going to be ready to file for licenses at the point your decision is made, compared to the numbers of men salivating for this niche (and already using it). Women will, however, start to use it if (a) they realize their input is wanted and needed -- in fact, essential; and (b) they begin to consider its potential to do what women have often done well, which is community-building.

Don Schellhardt, one of the three Leggett filers, seemed in telephone discussion with me to agree to my item (6), creating accountability to the neighborhood. He thought, however, that 51% of the residents' signatures should be enough to rescind a license, since it is tough to get everyone to "vote."

I'd like to add that Helen Thorington, President of New Radio & Performing Arts, based on Staten Island, New York, sent me an e-mail ratifying my list of suggestions.

Finally, I do support extending the comment period on this rule, as I believe many women and women's organizations would be interested but we have not had very much time since the comment period was opened to discuss what is both a very new idea and one with major implications for the public.

If you want the well-considered thinking of women, then

I urge that the rulemaking be postponed and the comment period held open for at least one year.



(FRIDA WENDER)