

**Patterson Park
Community Development Corporation**
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March 4, 1998

Federal Communications Commission
Office of the Secretary
1919 M Street NW
Room 222
Washington DC 20554

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Re: Public Comment on Rulemaking # 9208

I am commenting in support of the proposed petition. I understand that the intent of the petition is to dedicate two radio channels (one AM and one FM) to microradio broadcasting service for small (1 to several sq. mi.) coverage areas. Approval of this petition would alleviate to some extent a system that is fundamentally flawed with respect to the ratios of available frequencies to population groups.

Let me explain by contrasting two examples. Small towns, or counties in rural America have relatively small populations compared to large cities. Let us suppose that we are talking about a county with a population of 50,000, a fairly large county. To the extent that there is no major city nearby, those who want to broadcast to the county's 50,000 people have access to the wide range of radio channels on the entire AM and FM bands. Virtually all of the channels will broadcast advertising, public service programming, etc. of interest to the county's people.

However, in major cities such as Baltimore, all of the channels are allocated to broadcast entities that cover the entire metropolitan area, with the consequence that not even one channel is really allocated to a community of 50,000. To give a real world example, there is an area of Southeast Baltimore around Patterson Park that is home to over 50,000 people in an area of just two square miles. A radio station dedicated to the Patterson Park area would be a great source of information and pride to the residents of the area, yet it is not possible because no frequencies are available.

One other aspect of the existing situation is that, in the rural county example, merchants and business people can advertise in a way that reaches the target audience, and only the target audience (the county population) for a reasonable price. That is not possible for merchants of the Patterson Park area who must pay high rates for radio advertising to reach many people who live far too far away to ever shop there.

To summarize, I urge you to approve the petition. If anything, the number of channels dedicated to microradio channels should be expanded.

Sincerely,



Ed Rutkowski
Executive Director