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MAR - 5 1998

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2/25/98

FCC MAIL ROOM

To: The Secretary of
the Federal Communications Commission
1919 M. Street, N.W.
Washington D.C. 20554

Dear Sir,

I'm familiar with the petition # RM9208 and would like to offer a few words of support for the project. This is a matter I've felt passionately about since the United States Congress and the FCC both began to allow multiple stations to be owned by a common interest in a single market. It has forced the cost of ownership of broadcast outlets up and out of reach of the everyday person (or even some very rich people). I was on the ground floor of starting an FM station about 10 years ago and we did it for nearly 300 thousand dollars. Not a sum of money everyone has on hand. We had to put our funds together to get going. Today, it would take much more than that to even get the construction permit (Mainly lawyers fees to that point). The result is that we who wish to start up and own broadcast outlets, cannot unless we have multi-multi-millions of dollars.

Here's where #RM9208 comes in. This could allow the creation of local broadcast stations that serve a specific geographic part of a community. Minorities, clubs, special interest groups all would have an outlet they would have access to. Besides that, new jobs could be created. The recent allowed "grouping" of stations has led to massive lay-offs and a rise in automation dependence.

For micro broadcasting, I feel the power of 1 watt is too low in a city like Phoenix who has several 100 KW stations beating on the front end of every radio. 10 watts ERP should be the limit. A limit of no more than 100 feet HAAT should be allowed. This will give the signal a city grade coverage of just over 1 mile and a 1 mv contour of just over 2 miles. The operator should be held to all of the technical limitations the big licensees are bound to and a certain degree of self control needs to be maintained. Modulation, pre-emphasis, stereo

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separation, all of these things should be held to the same standards that other now have to adhere to. To help police things and take some of the burden off of the FCC, local committees could be set up to monitor and periodically inspect small micro powered operations.

There is a need for special interests, minorities just John Q. citizen to have a voice in the community. Even if the voice is that of a minority, does it make it any less important or valid? A minimum of public service announcements should be set at 2 per hour. Operation should be required 6 hours or more a day. Ownership of such stations should be limited to residents in the immediate coverage area. 1 person = 1 station ONLY!!! Multiple ownership would be prohibited. Listener comment periods should be used (as they currently are used) in licensing renewal. Owners of existing stations would not be eligible to own a micro station. Any station employing 5 or more people should be held to the EEO standards of normal stations. A signal not living up to it's commitment (as far as broadcast time, power levels, interference, etc.) would be up to forfeiture and given to someone who will serve the public.

The main studio should be located in the immediate coverage area and accessible to people in the service area.

I feel strongly about this as I have spent all of my life in the broadcast industry. I see a need for a station targeting the gay and lesbian community due to the ever changing playing field in politics and AIDs. No station will devote 100% of it's energy to attracting an audience of this type and it's not "mass appeal" yet it's a very valid need in our community. This is just one example.

How about the Boy Scouts or Girl Scouts? Local school districts could serve both parents and students with up to the minute closures or other announcements. A neighborhood could collectively pull together and have a forum to grind axes with each other. A church could serve it's immediate area with local news and events to keep kids off the streets and busy. Heck, kids could get in on running a station serving their peers and that would be that many fewer getting into trouble somewhere else. We're not talking about undermining the existing policies set forth by Congress, The FCC and the NAB. We're talking here about something that could get

people involved in their communities again. Let the micro broadcasters do what the "big guys" don't want to do. Let them air the local high school games. Air a live remote broadcast of a block party in a section of town (as a part of neighborhood watch program). Let the long haired weirdos have a music outlet. Have a call in talk show dealing with the problems in one specific school. Have a call in show with the local police department to address specific needs of a section of town. A lot could be learned from this. Give amateurs a chance to write and produce radio dramas. Allow a bulletin board for lost dogs and yard sales. This creates interest in the broadcasting field and it could create jobs for hundreds if not thousands of folks. I can't see trying to out-gun a huge corporate giant with 10 watts and a hand full of volunteers. There's nothing to loose but much to gain. I wish the NAB would come off their high horse and realize that micro broadcasting is a service, a basic right and not a threat to their well being. The NAB has been mentioned as it's represented bu a huge lobby and I'm only one person.

This could be an exciting new adventure in American broadcasting if you allowed micro broadcasters to participate in the media. I hope something positive comes from this as it is an amendment that has been needed for many years.

Sincerely,

William Blake Brodersen

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