

March 5, 1998

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Office of the Secretary
FCC
Room 222
1919 M St. NW
Washington, DC 20554

Re: Petition for Rulemaking # RM-9208

Dear Committee Members:

This letter will detail aspects of my support and areas of disagreement with RM-9208.

First of all, I would like to strongly register my agreement with the idea of re-instituting a low-power radio service. Several of the reasons why such a service is necessary were outlined in this proposal. I would like to add one more: It has been amply documented that the level of citizen participation in democratic processes can be directly correlated to participation in organizations that deal with issues of concern to local communities. Low-power radio stations can and have already provided a focus for such activity. The economic imperatives that must drive commercial and "public" radio stations make fulfilling such a role impossible. I believe that the concept of the "public interest, which is mandated for stations, but which is not enforced, can be defined on a local basis, in much the same way as is other standards, such as that governing obscenity.

Following this thought, while such stations would probably have a beneficial economic impact locally, I believe that the authors of this proposal should have emphasized the public service rather than the economic rationale for low-power service. This change in emphasis would result in other changes. It would mean, first of all, that one group or one community could only own one station (or one AM and one FM). Secondly, priority in licensing would be given to groups with strong ties to the community and not to individuals or universities that might be able to apply financial resources that would be out of the reach of communities.

I would also like to see a provision be made for mobile broadcasts. The cost of remote broadcasts via Marti, T-1 lines and so on, is very high. However, there are no costs associated with the placement of an antenna onto the roof of a building. This is especially important if the power limitation set forth in this proposal is adhered to.

Concerning that, I believe that one watt, especially in hilly terrain and in urban areas, would not be sufficient to fulfill the franchise of these stations to cover entire communities. An allotment of 20 watts would seem more reasonable.

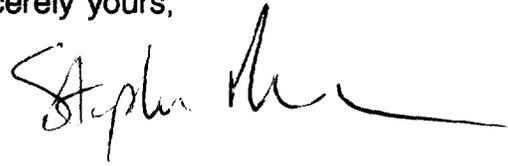
I strongly support the intent of this proposal to keep the licensing process simple and inexpensive, as well as that aspect which compels each station to broadcast a certain number of hours in order to retain its license.

To summarize: While there are aspects of this NPRM with which I disagree, I wholeheartedly support the implementation of a low-power radio service that can

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provide access for communities to the public airwaves.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Stephen Provizer", with a long horizontal flourish extending to the right.

Stephen Provizer
23 Winslow Rd.
Brookline, MA 02146