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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of
Proposal for Creation of the Low Power FM
(LPFM) Broadcast Service

FCC RM-9242

Office of the Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

Comments of Brett G. Reese

My name is Brett Reese. I am president of the Severance Chamber of Commerce. I am the former owner of one AM station and one FM radio station and have been involved in commercial radio for 15 years. I do not currently own any stations as I tired of the lack of attention I could give to what I considered important aspects of the small community I served. Commercial radio is driven by the bottom line as is the remodeling business I now own. Small radio station owners (like LPFM) should have the freedom to broadcast without continually being concerned whether or not a particular program will gain them advertising revenue. LPFM would afford station operators the leisure of allowing airtime for community based programming. What constitutes community programming? Getting opinions of the common townspeople about elections or the street problems or money issues or the new athletes in school this year. Talking to business owners who can't afford to pay advertising costs about what services they provide to the community. Gaining support for the local boy/girl scouting clubs, nursing home activities, a town recreation area, gain feedback for the idea of...youth involvement in learning about radio (by getting on the air, which is strictly taboo when $$ is bottom line) or a hundred other great causes that simply do not have the money to pay for $25 spots that will run once at 2am.

As a former radio station owner, I do see a potential problem in throwing licenses to almost anyone. First it is of utmost importance to have those grantees take the business very seriously, this won't happen with a license fee of anything less than about $4500 and a signature declaring that if their programming disregards FCC regulations, their license can be revoked. This license fee will also provide for start-up enforcement costs. These enforcement costs will go down because the "pirates" of yesteryear will have no excuses for their criminal activity.

The goal of this Petition is to create opportunities for individuals, minorities, women, small business and others with limited financial means to own low-power FM broadcast stations throughout America. Localism must be put back into broadcasting, something is lost when big corporations with distant owners buy up hundreds of stations, as is now

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being done. Since the passage of the Telecommunications Act of 1996, we are seeing a concentration of media never before witnessed in America. Large companies and public corporations with almost unlimited resources are acquiring vast numbers of stations at an alarming rate, forcing the prices of stations even higher and severely limiting the number of voices. Let's be true to ourselves and the FCC 1934 charter. The negative impact of this massive consolidation is being felt even in the smallest markets across the country, resulting in fewer voices/opinions on the airwaves. The long coveted principle of diversity of ownership in media seems to have fallen by the wayside in the rush to deregulate this industry. Will the 80% of markets that are already consolidated be broken up? Not likely. It will take a strong resolve on the part of the Commissioners to buck the National Association of Broadcasters (NAB) and deny the gratuities that are no doubt involved. In addition to the obvious advantages of having more voices represented, another benefit would be the creation of many jobs nationwide, both at stations and in the manufacturing of equipment and services for the thousands of new LPFM stations that will spring up under this plan.

There are many throughout America today willing to risk severe punishment just to be heard. For every person who is willing to take to the air with an unlicensed station, there are many more who wish to have
the ability to own a broadcast station but won't break the rules to do it. This fact speaks volumes and clearly demonstrates the demand for this new broadcast service. Indeed, the Commission on its own Internet webpage states that it receives inquiries from over 13,000 individuals and groups each year that desire to start their own low-power radio station. It is hoped that enactment of the ideas put forth in this petition will allow many of these would-be broadcasters and many of the so called "pirates" to become legitimate, licensed broadcasters serving their communities by putting the much needed local element back into broadcasting. And again, these "pirates" should be sorted out with a simple $3500 to $4500 license fee attached to each granted license. This fee not only provides funds for rule enforcement, but also acts as a sort of decency leash on these "pirates" (whom the NAB must be screaming about allowing these sordid types on the air). And as for the NAB's claim that amateurs will rule the waves, survival of the fittest holds true in any business. This fee acts as a damage deposit would in a rental home. If the grantee fails to abide by the conditions of the license, including interference implications, the license is revoked.

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