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Before the Federal Communications Commission, Washington, D.C. 20554
In the Matter Of: RM-9208 and RM-9242

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

Original : RM-9242

CC: Nickolaus E. Leggett
1432 Northgate Square #2A
Reston, VA 20190-3748

CC: Rodger Skinner
TRA Communications Consultant, Inc.
6431 NW 65th Terrace
Pompano Beach, Florida 33067-1546

Comments on Proposals for LPPM: RM-9208 and RM-9242

Filed by: Americans for Radio Diversity
2355 Fairview Ave. #156
Roseville, MN 55113
Date: April 10th, 1998

Americans for Radio Diversity (ARD) is a non-profit Minneapolis based organization, comprised of concerned radio listeners and consumers, dedicated to promoting community orientated radio broadcasting. In support of this cause we are writing to file our comments in regard to the two current proposals for Low-Power FM (LPFM) currently on file with the FCC: RM-9208 (Leggett) and RM-9242 (Skinner)

ARD is in agreement with both petitioners reasoning for wanting LPFM implemented. In this post-Telecom Act of '96 environment that we live in, it is more important than ever to provide for diverse community voices. The FCC is supposed to treat the airwaves as a public trust and now is a good time to show that the FCC really has that in mind. Below are comments ARD would like to file based on the contents of RM-9208 and RM-9242.

1) The 1 watt restriction of RM-9208 may not allow for sufficient coverage area for some target communities. Additional comments filed by the RM-9208 petitioners backs up this notion. However, the 3000 watt limit put forth in RM-9242 proposal may be too high for most metro areas. Power levels should not be allowed to crowd out smaller stations. The objective should be increased participation, not a few additional stations imitating their bigger brothers. Therefore, it would make sense to set the limit for LPFM stations at 100 watts or below, which the FCC has no provisions for at this time.

2) ARD supports RM-9242's notion of residential requirements for ownership. However, we suggest shrinking the stated 50 mile requirement. ARD has doubts someone living 50 miles from our different neighborhoods truly knows the community needs of those neighborhoods. ARD suggests that a 25 mile requirement may be better suited to maintaining community interests. In rural areas where the pool of potential broadcasters is much smaller, the 50 mile requirement may be appropriate.

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3) ARD would like to see a provision to have a limit of one station per owner. The goal should be diverse voices and community focus, and this would help achieve that goal. Allowing multiple licenses only would serve to limit the number of people that could enter into radio broadcasting.

4) Equipment used should have to meet minimum specs in respect to such things as stability, filtering, and modulation control. This would ease some of the FCC concern about interference and bleed over.

5) If or when TV goes digital, ARD suggests opening up the FM band by including VHF TV channel six at the left of the dial. This would widen the FM broadcast band allowing for more participants to enter the market.

6) ARD supports the idea that these LPFM stations could be for profit. This would help small "mom and pop" business to be able to afford radio advertising which they currently can not with today's inflated advertising costs. This, in turn, would help strengthen communities. Also, this would provide a source of revenue for LPFM broadcasters so that they can maintain a high level of signal and broadcast content quality. ARD is opposed to any license holder utilizing a station solely to promote and advertise a business in which they are vested.

7) ARD supports the notion that all broadcasters should meet a minimum number of broadcast hours or forfeit the license. This would insure that bandwidth is not being wasted. Perhaps a "time-share" program could be set up to help with this problem.

8) ARD believes a minimum requirement for locally produced content should also be strongly considered. This would insure that the station is benefiting the community by covering local issues, playing local music, and providing an outlet for community members to participate in radio broadcasting.

9) A body of micro-broadcasters could be set-up to oversee the micro-power stations. This would help reduce administrative costs for the FCC. Self regulatory systems have been shown to work in other arenas such as Ham radio. To avoid conflicts of interest, the FCC would still be responsible for licensing the LPFM stations, but the micro-broadcast body would be responsible for overseeing other technical details such as signal quality, interference, and broadcast content. The FCC would be seen as a "court of last resort" if these issues could not be solved on the community level.

10) If the FCC is not sure how a LPFM system would work, ARD suggests that the FCC pick a community as a proving ground to try out ideas for a LPFM system. Communities already involved in the micro-broadcast movement such as the San Francisco Bay Area, Minneapolis, and Southern Florida would be ideal to start out with.

ARD welcomes any comments or questions. ARD strongly encourages the FCC to take this to the next step whether that be issuing a Notice of Proposed Rule Making (NPRM) or a Notice of Inquiry (NOI).

Signed:

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Casey Torgerson
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ARD Members

Eric Lindgren
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