Mark Blake
P.O. Box 7361
Bloomfield, CT 06002
(860) 802-9906

April 22, 1998

DOCKET FILE COPY ORIGINAL

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**

Comments of Mark Blake

Background

Over the years, the program choices on commercial radio has gotten progressively worse particularly on the FM band. This is in especially true for minorities whose choice "niche" programming needs are passed up by program directors for more lucrative formats.

Case in point:

- In Hartford, Connecticut well over 50,000 enjoy listening to gospel music for a significant part of their day but there is no FCC licensed station to provide for that programming need. Were it not for the efforts of an unlicensed station which provides 100+ hours of gospel programming to a portion of the community, there would only be 9 hours of gospel music heard on local college stations.

- In Hartford, there are over 40,000 people from the West Indies many of whom would like a Caribbean programming format. Despite this interest, there is no commercial station dedicated to providing any significant programming time for this format.

- Again in Hartford, a contemporary jazz format would probably attract as many as 75,000 listeners but again, there are no commercial stations dedicated to providing for this format.

All three examples have one thing in common: while each would attract a significant listenership, the numbers attracted would be less than that of another format such as top 40.

While areas such as Hartford have a diverse population, the choices available on commercial radio does not proportionally reflect that diversity. On of the roles which the FCC is commissioned to perform is diversity of programming and assuring that the public's needs are being met. In the words of past FCC Commissioners, little if any has been done to enforce these requirements.

10

The Telecommunications Act of 1996 has resulted in a major consolidation in radio station ownership in every market across the country. Public need has been pushed aside for corporate interest. Something must be done to give a portion of the airwaves back to the American people and to broadcasters who are serious about meeting a public need but lack the financial resources to own a high powered station.

Response To RM-9242

The Petition For Rulemaking RM-9242 proposed by Rodger Skinner, Jr. from TRA Communications Consultants, Inc. outlines an excellent means of giving the public a voice on FM radio. The Low Power FM service which would be created if RM-9242 is implemented would provide meaningful levels of power to allow individuals to broadcast to their community.

The proposal provides for the complete spectrum of potential low power FM broadcasters with the LPFM-1, LPFM-2 and LPFM-3 classes of service. This proposal is far superior to the 1 watt proposal suggested in RM-9208. I maintain that a restriction of 1 watt is arbitrary and only seeks to limit the reach of a broadcaster outside the corporate giant circles. A LPFM broadcaster should be able maximize their transmitted power provided that there is no interference to established stations. If a market can only support a power level of 750 watts, then that should be the limit and not an arbitrary number. RM-9242 3,000 watt maximum is an adequate level of power to provide coverage to a community.

The simplified application process for RM-9242 would increase broadcasting ownership for minorities like myself who lack the millions of dollars required to buy a high power station.

The adjacent channel revisions suggested by RM-9242 would give a more liberal definition of channel availability long since a problem with the FCC in attempts to start a station. This broader definition would open more channels in nearly every market across the country.

I support the ownership restriction proposed by RM-9242. By requiring the owner of the station to live within 50 miles of the station's antenna, it would prohibit large corporations from obtaining the new channels merely to keep out the smaller entrants into the market.

I support the suggestion of RM-9242 that the new LPFM channels not be auctioned off as required by the Balanced Budget Act Of 1997. This would defeat the propose of providing a means for those of lesser means to broadcast to the community.

We cannot assume that all applicants to a LPFM channel would by default meet a local public need. As a result, I would modify RM-9242 to require that an applicant provide proof that their proposed service would meet a local community need. In the event that there are multiple applications for the same channel, it should be awarded to that which meets the greatest public need.

Summary

In summary, I support RM-9242 with the few modifications noted.

Respectfully Submitted,

Mark Blake