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

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APR 28 1998
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In the Matter of
Proposal for Creation of the Low Power FM
(LPFM) Broadcast Service

FCC RM-9242

Comments of John Scavo

Due to some personal situations, I may not be able to mail my comments prior to April 27th, 1998. I would ask the Commission to please consider my comments and accept my apologies for submitting this letter should it arrive just short of the deadline date.

I would like to state my comments regarding Petition RM-9242, LPFM. Radio Broadcasting had in the distant past provided an abundance of local programming and provisions for local involvement from the public. It has become so apparent that over the past years, particularly since the Telecommunications Act of recent, that radio stations no longer provide enough stand-alone provisions for local talent, news, music, neighborhood/community affairs, happenings or local high school sports.

The recent trend of multi-station ownership have fueled a media that has quite honestly turned into a mega-billion dollar industry. For the citizen who would like to own and/or operate a small neighborhood micro-broadcasting station, it has become apparent that there is no way to afford to ever realize this dream, given amongst many reasons, the millions of dollars that these properties are now being sold for.

Unless one is part of the NAB, CBS, or some other conglomerate, ownership of an FM/AM property is nearly extinct. I for example, do not have the billions of dollars to purchase these high priced properties. Outside of the prices, these stations have now been allowed to broadcast simulcasts across their properties, eliminate entire staffs, and local programming to satellite programming. More recently, re-broadcast using translators on the FM band In the Boston and Merrimack areas, stations like WOKQ, WFNX, WGIR, and too many others, are allowed to re-broadcast on second adjacent channels and in most cases, actually carry clean signals across multiple frequencies in the same geographic areas for miles! Furthermore, the Commission has allowed monopolies to actually carry the broadcasting of one area across all of a conglomerates other properties. Hearing programming on a 50,000 watt station atop Mt. Washington, on a translator in Manchester, NH that actually originates from Rochester, NH is ludicrous. It would certainly have served the community's best interests to hear local programming on all three frequencies. This practice is way out of hand, much more than the so-called "pirates" out there. Micro-broadcasters who have been around for a while tend to love broadcasting and just want a property to broadcast to a neighborhood and/or community legally. It is very discouraging to deal with the fact that micro-broadcasting is not allowed while a licensed station can carry the exact same program over multiple properties, therefore, not serving it's multiple communities.

I honestly feel that the FCC is contributing to the lack of community voices and talent by not allowing community micro-broadcasting. Rules appear to be servicing the major operations. For example, presently an individual cannot get a license on FM under 100 watts, however, a licensed

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radio station is allowed to become licensed to transmit under 100 watts using translators. This is wrong!. The fact that an area can receive one station on two frequencies in an area is absurd. I would much rather see those translator frequencies put to use by allowing micro-broadcasters to broadcast community localized programming under 100 watts.

I feel that petition RM-9242 addresses community broadcasting needs. Therefore, I support strongly the initiative of LPFM as stated in RM-9242. LPFM stations should be allowed adequate minimal power levels to broadcast to an entire community without drifting or noise. To be a successful community/neighborhood station, I would expect the Commission to allow at least the same distances and signal grades that it has allowed the translators. As far as the translators, they should become secondary to local micro-broadcasters and eventually be eliminated. The fact that I can receive a translator up to 15 miles away does not make sense to me at all.

I urge the Commission to allow micro-broadcasters of the past and present such as Radio Free Allston, Radio Free Berkley, EB101, and many others to exist and provide local quality programming. I would also ask that you take the petition seriously. Useless 1 watt/1 mile approvals will inhibit coverage of a community.

In summary, please allow the licensing of micro-broadcasters and provide simplified methods and fees to "open the door" for us broadcast hobbyists and lovers of radio, community affairs, and citizens.

4/24/98

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