



Educational Media Foundation

A 501(c)3 Non-Profit Organization

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April 27, 1998

APR 27 1998

To: The Federal Communications Commission/Mass Media Bureau

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: RM-9208 Petition for Microstation Broadcasting Service

Educational Media Foundation ("EMF") is a non-profit corporation which owns 2 AM broadcast stations, 11 FM stations (and construction permits for 3 others), along with 24 FM translators, all operating on a non-commercial, listener-supported basis. EMF's FM stations and translators are located on both the reserved and the commercial bands.

The petition states that licensing microstations would help "energize" our communities, helping "individuals, families and neighborhoods to survive and prosper." Also included is a statement that allowing five microstations per licensee is "enough microstations to allow entrepreneurs to be motivated by the prospect of genuine wealth."

This is not the real world of radio with which we are familiar. "Genuine wealth" from a collection of five one-watt radio stations at least fifty miles from each other?

A more likely result would be frustration. Frustration on the part of operators lacking a viable signal and frustration of the part of potential listeners unable to receive a reliable signal.

EMF is concerned that it might not be easy to locate available channels without disrupting existing service (for example, service from an FM translator, or service from a distant station beyond its protected contour). EMF would anticipate that should the proposed rulemaking be adopted as stated that the lack of a viable signal would almost immediately result in requests for additional power and additional channels for the new service which could ultimately degrade the spectrum.

EMF is therefore opposed to the proposed rulemaking.

Submitted by:

EDUCATIONAL MEDIA FOUNDATION

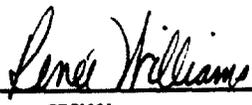

Richard Jenkins, President

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CERTIFICATE OF SERVICE

I, Renee Williams, do hereby certify that I have this 27th day of April, 1998, mailed by first-class United States mail, postage prepaid, copies of the foregoing "**COMMENTS REGARDING PETITION FOR RULEMAKING**" to the following:

Mr. Nickolaus E. Leggett
1432 Northgate Square, #2A
Reston, Virginia 20190-3748



Renee Williams