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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Proposal for Creation of the Low Power FM (LPFM) Broadcast Service	)	RM Number 9242
	)	
Petition for a Microstation Radio Broadcasting Service	)	RM Number 9208

COMMENTS OF
COLUMBINE INVESTMENTS, INC.

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Columbine Investments, Inc. (hereinafter "Columbine"), by its undersigned counsel and pursuant to Section 1.405(a) of the Commission's Rules and Regulations, hereby files its comments in response to the above-captioned petitions for rulemaking each of which set forth proposals for the establishment of a low power radio broadcasting service. For the reasons discussed below, Columbine supports the establishment of a low power radio broadcasting service. Accordingly, Columbine urges the Commission to initiate the adoption of rules establishing this service by quickly issuing a Notice of Proposed Rulemaking.

I. INTRODUCTION AND STATEMENT OF INTEREST

Columbine currently holds an experimental broadcast license to operate Station WA2XKB in Charlotte NC. The purpose of the experimental operation is to test the marketability and technical feasibility of a low power, multi-site radio station using FM frequencies, with coverage and format geared to travelers. If successful, this technology could be used to provide a new "Travelers Radio Service" whereby motorists would be able to receive information on traffic, road and weather conditions, and other

relevant topics in the areas in which they are traveling. Because this is the type of niche service which potentially could be provided by a low power radio broadcasting station, Columbine welcomes the opportunity to comment in this proceeding.

Columbine believes that establishment of a low power radio service would serve the public interest in a number of ways. First, a low power radio broadcasting service would serve as a vehicle by which a variety of programming choices could be offered to small communities or niche segments of communities in urban areas. Second, such a service could serve as a vehicle for entrepreneurs to develop new types of programming or uses designed to enhance the broadcasting service. Third, the establishment of a low power radio broadcasting service would help to alleviate barriers to entry within the broadcast industry. For these reasons, Columbine supports the establishment of a low power radio broadcasting service and strongly urges the Commission to initiate a rulemaking proceeding in order to adopt rules establishing such a service.

II. ESTABLISHMENT OF A LOW POWER RADIO BROADCASTING SERVICE WOULD PROVIDE A NUMBER OF THE PUBLIC INTEREST BENEFITS TO THE COMMUNITIES WHICH THEY WOULD SERVE.

As has been the case with low power television, a low power radio broadcasting service would provide a panoply of public interest benefits to the communities which they would serve. First, this service could potentially do for the radio industry what low power television has done for the television industry. As several commentors already have noted in this proceeding, low power radio broadcasting stations could serve as sources of diverse programming designed to address the specific needs and interests of

small communities or niches within urban communities which are either underserved or unserved by the larger full power broadcast stations.[1] For example, a low power radio station, owned by members of a specific community, could provide special news and information programming of local interest. In addition, such a station could provide alternatives to the Top 40 music programming that so dominates the programming of larger stations, particularly in metropolitan areas. Such stations could also be used to provide travelers' information. Moreover, low power radio service stations could be more likely to offer programming addressing the specific needs of remote areas.

A low power radio broadcasting service also could provide a vehicle for entrepreneurs to develop new types of programming or uses, designed to enhance the broadcasting service without the restrictions of an experimental license.

Moreover, establishment of a low power radio broadcasting service also could help to alleviate barriers to entry within the broadcasting industry by opening up opportunities for small businesses and other new entrants to participate within the radio industry. As such, establishment of this service could help to alleviate the negative impact resulting from the increases in concentration of ownership within the broadcast industry since the enactment of the Telecommunications Act of 1996.

III. CONCLUSION

Columbine supports establishment of a low power radio broadcasting service. Such stations could provide local programming to underserved or unserved

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[1] See e.g., Comments of James J. Henderson, at 1; Comments of Jeff Grammar, at 1; Comments of Great Wireless Talking Machine, Inc., at 1; Comments of Martin D. Wade, at 1-2; Comments of John L. Ewy, at 1. All of these comments were filed in response to RM Number 9242.

communities, encourage innovation which would, in turn, enhance the broadcasting service, and encourage more diverse participation within the radio industry. Accordingly, Columbine urges the Commission to issue a Notice of Proposed Rulemaking in this proceeding as expeditiously as possible.

Respectfully submitted:

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April 27, 1998

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 27th day of April, 1998, I caused copies of the foregoing document to be served by first class mail, postage prepaid to the following:

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