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Office of the Secretary
Room 222
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

Reference: RM-9208 - Reply Comments

Dear Sirs -

My comments are in support of and in regard to RM-9208 and founded upon my past experience with early "community broadcasting", recent challenges attempting to obtain a construction permit for a low-power community FM station, and my present activities as a volunteer Crime Prevention Specialist with the Salt Lake County Sheriff's Office.

When I was a student at Syracuse University in the late 1950s, the Commission allowed the university to operate - as a pilot project - WAER, the first non-commercial-educational FM station, on 88.1 MHz with a transmitter power of 2-1/2 watts. The transmitter was located in the basement of the Carnegie Library and the losses in the transmission line leading to the single donut antenna located on the library's roof reduced the station's output to approximately 1 watt ERP. This ERP was quite effective in covering the main Syracuse University campus, which covered about a two-square-mile area. This was truly "community broadcasting" on micro power.

Following some experience with WAER, the group of non-commercial-educational frequencies starting with 88.1 were made available and many very low power stations were licensed, but over the years the Commission increased the minimum output power for new licensees in this band to 100 watts. Today, most "non-commercial-educational" stations operate with power up to 100,000 watts, serve large geographical areas, and no longer serve the interests of small or distinctive "communities" or "sub-communities". In fact, they have for the most part become very much like commercial stations catering to relatively large groups of listeners, all sound very much the same, and do not contribute to validating the diversity or enhancing the cohesiveness of the populations in their coverage area.

In metropolitan Salt Lake City, for example, three relatively high power stations operate

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in the "non commercial educational" block. The University of Utah's station, KUER, carries NPR news and talk features and programs classical music all day and jazz all night. BYU's station, KBYU, also carries the same NPR news and talk features as KUER and programs classical music 24 hours a day. A third and independent station, KRCL, which refers to itself as "Radio Free Utah", attempts to broadcast diverse programming to many diverse audiences in metropolitan Salt Lake City with rather diffuse results. For the most part, it is not possible to solicit in-depth coverage of, or attention to, major neighborhood or sub-community events and undertakings at these stations. In fact, it is sometimes easier to gain the attention of the commercial stations than the non-commercial ones for such enterprises as Community Watch, school, and community activities when they coincide with the commercial stations' promotional self interest.

Several other educational institutions along the Wasatch Front (the valley corridor between Logan and Nephi, Utah) are also on the air with generally similar programming to the above but with marginal signals into Metropolitan Salt Lake City. In addition, some individuals and religious organizations broadcast in metro Salt Lake with relatively low power (in the 100 to 1000 watt ERP range), some on "non commercial educational" frequencies, others on commercial channels. Some of these low power stations mimic the programming of the university stations, including carrying NPR news and talk. They are not community-involved. The religious stations are generally fed programs via satellite from a central source and are also not community-involved.

One of the unique characteristics of FM broadcasting is that the stronger of any two or more signals overcomes the weaker ones, allowing for viable "micro broadcasting" in a community "market". If the Commission will set aside one or more AM and FM frequencies on which sub-community interests can operate 1 watt stations with a range of one to several miles, few unresolvable interference problems will be encountered and the needs of diversity will be greatly enhanced at a time when many adverse community influences seem to combine to frustrate needed cohesiveness and acceptance.

In metro Salt Lake, for example, 34 "Community Councils" strive to represent the interests of the races, nationalities, religions, unique interests, and specialized needs of their geographical areas within a radius of perhaps one mile. Organizations such as the Salt Lake County Sheriff's Office and other government and public service organizations strive to tailor support and programs for these areas' unique needs. Were community activists and organizations in those areas to have access to frequencies on which to broadcast information about the activities and needs present there, the work of community building would be greatly enhanced.

The concept of "micro broadcasting" is discounted by existing commercial and non-commercial licensees as technically infeasible because of potential interference. As a ham radio operator, I know that this need not be a roadblock. For years, hams have used volunteer regional frequency coordinators who have for the most part satisfied the desires

of most hams in a given area using only a limited number of frequencies for repeaters and other kinds of stations. Such regional frequency coordinators could also be appointed by the Commission or selected with Commission guidance by community interests to perform a comparable function for "micro broadcasting" in any given area.

In his recent address to the NAB Commissioner Kennard addressed and adroitly blended some of the needs and solutions identified above. With reasonable input from existing broadcasters and those desiring to explore the potential value of "micro broadcasting", the time to give the idea a try is now.

Sincerely yours,



Norman B. Ross

