From: "Kelly Kombat" <x87x@hotmail.com>

Dear CDC,

I fully agree with and support the proposal in RM 9208.

Elizabeth Morris
2707 Oakdale Ave
Tampa, Fl 33602
813-223-9171

!tampa low power broadcasting company!

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From: improviz@gis.net (stephen provizer)
Subject: "RM 9208"
You can put me down as a supporter of your proposal.

Steve Provizer
23 Winslow Rd
Brookline, MA 02146

Radio Free Allston--106.1
"A Voice For Community"
617-232-3174

*Note our new URL: <http://radfrall.org/>

From: patty heffley <patty@inch.com>

Support of Counter-proposal to RM9208

As a citizen of the USA and with rights of free speech and hope for democracy, I support the attached counter-proposal of the CDC of the NLG as a very good alternative to shutting out those that own the airwaves- The People.

I am licensed by the FCC as a HAM operator. The FCC has given us the right to be on the air. We seem to get along fine with reasonable rules. There is very little problem with mis-use. I believe that the same will be with microbroadcasting.

Patricia Heffley
KC2CBE
Save Our Station/WBAI 99.5FM New York Community Sponsored radio
511 w. 20th st.
NYC, NY 10011

From: Jesse Moorman <jmoorman@igc.org>

I join and support the proposed rulemaking.

Jesse Moorman
jmoorman@igc.org
(NLG CDC member)

From: "Lorenzo Edward Ervin,jr." <lervin@mindspring.com>
Organization: MindSpring Enterprises, Inc.

COMMENTS IN SUPPORT OF RM9208 -TO ESTABLISH A MICROPOWER BRAODCAST SERVICE-ON BEHALF OF BLACK LIBERATION RADIO NETWORK

1. Because of our under-representation in the broadcast industry as owners (600% under-represented) or employees (only 20% of the total), the only way that most minority owners/managers of any broadcast property will ever obtain control of a radio station is with a low cost micropower station.

2. The FCC's rules, requiring financial qualification, before any license can be granted hampers the ability of racial minorities to obtain radio station licenses. This discriminates against low income or small nonprofits in the Black community, and racial minorities generally.

2. The change from liberal to rigid rules by the FCC, forbiding distress sales of stations, increased power requirements for non-commercial service (100 watts minimum), elimination of minority ownership incentive rule, elimination of duopoly rule, and other regulations to promote diversity has created a dearth of radio station owners in Black communities.

3. Outright censorship by the FCC and corporate media control by major broadcast companies of the content of broadcasting in minority communities.

4. Allowing white corporate seizure of most minority controlled radio stations in the Black/minority communities in the U.S.

5. Lack of Broadcast content diversity. The FCC is guilty of refusing to exercise control over re-licensing of stations that clearly do not serve the Black community, and engage in politically biased and racist programming, while it suppresses Black radical programming and speech.

6. The FCC should allow the creation of a new broadcast service where spectrum space exists, and clearly no interference is found or contemplated. Where there are no technical limitations and no interference with existing stations, it should be allowed with moderate or no regulation.

7. The FCC rules are illegal and unconsitutional when they are clearly only to give a competitive advantage to white license holders in a broadcast market, and only favor the rich.

8. The FCC regulations are illegal and unconstitutional when they clealy censor and control free expression, even anti-government sentiments and the call for Black revolution.

We therefore fully support the proposal by the Committee for Democratic Communications of the National Lawyers Guild for creation of a new broadcast service. It is the only proposal we do support, and we want our support for this new service heard and registered by this agency. Thank you.

Sincerely,

Lorenzo Komboa Ervin, Black Liberation Radio of Tennessee
P.O. Box 5604, Chattanooga, TN. 37404

From: San Francisco Liberation Radio <sflr@slip.net>

San Francisco Liberation Radio*s comments to the Federal Communications Commission:

In regard to the proposals put forward by the Committee on Democratic Communications of the National Lawyers Guild, we add the following remarks:

We are glad to see that some forward motion is being made here. However, it is going very quickly and we don't want to be rushed into agreeing to anything that will have a lasting impact on micro radio without time to think about it and discuss it with fellow broadcasters. We propose there be an expanded period of time to work out rules we can all live with. We urge you to make a genuine effort to restore some semblance of balance and democracy to the nation's airwaves. These last few years of consolidation in the broadcast industry, particularly in the wake of the Telecommunications Act of 1996, have resulted in the elimination of entire topics of conversation and points of view from radio broadcasts. While WE accept the need to protect the integrity of the airwaves, we urge YOU, on the other hand, to recognize that this is an injustice which cries out to be rectified.

Generally we agree with most of the CDC's proposals, however, we do have some concerns in the following areas:

Proposal number 7 would set a 50 watt maximum on micro stations in urban areas. We are concerned that this may be too low for an urban area like San Francisco, a city well known for its hilly, mountainous terrain. Micro radio stations in this city are consigned to a virtual broadcast apartheid, with our signals hemmed in and confined to small pockets of territory. Speaking for our own station, this fact of nature leaves significant portions of our community inadequately served by our signal. For instance, the Haight Ashbury neighborhood lies a mere three miles from our antenna as the crow flies. Yet parts of the neighborhood cannot receive our signal at all, while others do so only with great difficulty. We would like to see rules that would allow an urban micro station to broadcast at up to

100 watts when a demonstrable need exists. We would appreciate it if the FCC would provide a forum in which this issue could be discussed more fully. We would like to point out that it was the FCC itself which arbitrarily chose a cut off point of 100 watts when it eliminated low power radio some eighteen or twenty years ago. We would like to see this entire 100-yard field of territory, charted completely off the map when the FCC changed its rules, regained now for the American people.

Proposal number 10 would provide for a registration period of four years, without mentioning anything about options for renewal. We would like to see this point clarified. What happens four years from now?

Proposal number 8 mentions a "voluntary body" that would be set up by the "local or regional micropower broadcast community to oversee micropower stations." We think the setting up of such a body is a good idea, however, we are concerned--and this may be outside the purview of the FCC--that it operate democratically, with at least one representative from each micro station in the region included in the decision-making process.

We have other issues regarding fundraising. As a strictly non-commercial station ourselves, we have no problem with proposal number 1. However, if we had our druthers we would probably like to see the decision as to commercial versus non-commercial status left up to each individual station. Setting up a micro station can cost $1,000 or more. How are people in poorer communities going to be able to afford this? This matter, too, deserves a forum for discussion, and we encourage the FCC to provide one. Moreover, even a non-commercial station must raise money. We would assume that non-commercial micro stations would have the right to hold on-air fundraisers just like any other public or listener supported station, however, perhaps this should be spelled out in any final agreement.

San Francisco Liberation Radio, 750 LaPlaya Box 852, San Francisco, CA
415-750-1714
Richard Edmondson