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Reply comments = RM-9242, RM-9208 - Low power FM service

From: Gregory Caliri, 10 Tudor Court, Bradford MA 01835

I am in favor of the implementation of a LPFM broadcasting service. While I do not have expertise and knowledge of situations across the United States, I can cite recent history of occurrences in my hometown of Haverhill, Massachusetts. Haverhill is a city of 50,000 residents and is located 35 miles north of Boston.

A LPFM will fill the void and restore local news to our city. Although two stations have Haverhill as their "city of license", I personally feel that we are not being served adequately, and have been virtually abandoned in terms of news coverage and local events by both stations.

We lost community service, and want it back - Big is not better

In March of 1994, WHAV(AM), a 1000 watt, 24-hour per day station that provided English and Spanish language programming, local news coverage, and community events to Haverhill. Its sister station, WLYT(FM), now WXRV(FM), had always operated as a Boston station (I believe the industry term applied to such a station is "rimshot"). On March 6 of that year, WHAV(AM) was turned over to Costa Communications for use as an LMA until the license transfer went through. I was party to an informal objection over transfer of the license (BAL-950323EA) as published reports indicated that the broadcast entity and one of the two major newspapers in the area were entering into a partnership to acquire radio stations. Mr. Costa's business arrangement with a subsidiary of the Lawrence Eagle-Tribune newspaper and ownership of another AM station (WNNW(AM)), licensed to nearby Salem, NH, constituted a threat of too much central media control in the area.

While the FCC refused to hear our pleading - what we said would happen has happened. The partnership, which Costa claimed was only an "understanding" at the time, did become the Costa-Eagle partnership, went on to purchase WCCM(AM), the third remaining AM station in the Lawrence-Haverhill area, and now operates all three stations out of a building in Methuen, Massachusetts - not the city of license for any of the three stations. The other half of the partnership, the Eagle-Tribune, bought out its competitor newspaper, the Haverhill Gazette, only days after the license transfer of WCCM(AM) was approved.

So, there is a virtual news monopoly here. Due to economic factors, WXRV(FM) operates itself as a Boston-area station and apparently has little interest in providing us with any news of events in Haverhill. *

Haverhill needs a broadcast voice to provide community service. It doesn't have to be polished, or slick. We'd like to know what's going on in our city. If we consider the recent history of Haverhill broadcasting, implementation of an LPFM station isn't a luxury, but a necessity.

This may sound like "sour grapes" from someone who lost his pleading. I wish Costa-Eagle success with their ventures, and have no animosity toward them. The above was presented as an example of what is happening throughout the country now with deregulation, and also as evidence that LPFM will complement the service provided by these commercial broadcasters. My objective then, as now, is to see my city served with local radio news and current events programming during some part of the broadcast day.

I've read about the claimed billions of dollars of public service activities donated by radio stations. This is excellent - but then again, a radio station's job is to provide public service in the form of news, and community affairs, if only on a part-time basis.

* on a daily basis

Competitive Aspects

There have been accusations that those who oppose LPFM are fearful of competition from these new outlets. I doubt that this would be the case in our area. Why would any of the stations licensed to serve Haverhill, or Salem NH, or the AM stations licensed to nearby Lawrence be concerned about competition from a Haverhill LPFM? The audience that LPFM would reach in the greater Haverhill area is one that is not being reached out to any great degree by the three area AM stations at the present time. Any argument of competition is moot. This is a different audience - one concerned about the city of Haverhill as a community unto itself, and LPFM would only serve to enhance the diversity of broadcast service to our area.

Fears of Chaos and Irresponsible operation

This argument has been extended and has provided me with a great degree of amusement. I can only cite what I've read on the Internet, and read in the area newspapers. What have I seen in the last several years?

The bad -

- A nationally known "shock-jock" was to make his debut in a midwestern city. When he arrived there to debut his show in that city (Cleveland?), employees of a competing station opted to sabotage the satellite delivery system. If I recall correctly, it had no effect in that market but did successfully block distribution of the signal across the country. The perpetrators were punished.

- If published reports are correct, a Denver radio station's morning team invaded a mosque in that city as part of a publicity stunt.

- Closer to home, a recent, sick, perverse publicity stunt was generated by WAAF(FM), a Framingham licensee running as a Boston "rimshot". They announced that the Mayor of Boston had been killed. This was an April Fool's joke, or so we're told. While it caused some havoc at City Hall, and came close to harming the mayor's family, the station attempted to extend the publicity stunt by asking the mayor if he'd like to throw pies at the DJs in an open area. The offer was refused, and at last reports the Commission is in receipt of a broadcast hoax complaint from the City of Boston. Since I've got your attention, may I ask you to act on it.

The good -

Eastern Massachusetts is blessed with colleges and universities. As a result, they have also been blessed with outstanding collegiate radio - from Boston University, Brandeis, Harvard, Boston College, UMass-Boston, Tufts, MIT, and Emerson. There were more, but those services were eliminated when class D FM stations were virtually outlawed in the 1980s.

I have heard of no acts of irresponsibility from any of these stations in the last 20 years.

The moral of the story? Being "professional" and having millions of dollars is no guarantee of responsible behavior on the public airwaves. The flip side of this is that many low-budget broadcasters have been able to serve their college communities in an extremely responsible fashion. There is a community station operating in Boxford, Massachusetts - WBMT(FM). While it's a part-time operation, and it does in fact have high school kids playing records for part of the day (I cannot understand the fear of commercial broadcasters of this), it also carries city council meetings, local news, high school events, and community bulletin boards. It is truly what LPFM can deliver to cities like Haverhill, and what they need - but are prohibited from asking for.

Other comments

Giving preference to displaced LPTV license holders
I am opposed to this, because of the past abuses of the LPTV system. As you know, LPTV was purportedly designed to allow local community service. As it turned out, a great many of them are being used for shopping channels, religious broadcasting on a national level, and relays of other services on a national basis. Reserving allocations for those displaced licensees should not be considered. Since most in favor of an LPFM service are interested in community service, I feel that there is a consensus that the emphasis on LPFM should remain within the cities and towns to be served.

Power limitations, technical obstacles
I find it difficult, as a non-engineer, to comment in this area. Hopefully the licensing process will include necessary engineering and non-interference considerations. And, power levels will be permitted so that the community or city of license can be adequately covered and served.

Who should be eligible?
Those who do not hold commercial broadcast licenses and do live within the city of license should receive first priority. Since LPFM is to be synonymous with local service, I do not see any difficulty with keeping control and operation of these stations within their communities. Existing commercial broadcasters should be given a lower priority than community groups. If the service is to be community oriented, then the service should be dedicated to those willing to provide service in that area. Under no circumstances should those holding commercial broadcast licenses in the city of license be permitted to apply for an LPFM license there. With limited exceptions, there should be a limit of one LPFM license per applicant.

Auction, first application in?
No auctions, please. LPFM should not go to the highest bidder. Community service is the focus here, not who has the most money. One of the reasons many stations are in trouble today is that many commercial broadcasters today paid too darn much for them. Perhaps they purchased these stations as a speculative investment versus a business investment? Should we protect the value of their stations? I think not. Should we allow anyone to speculate in LPFM licenses? I think not.

To prevent further speculation efforts by some, the sale and transfer of construction permits should be prohibited.

Regulations on time of operation
Six hours per day, seven days a week as a minimum. Where more than one applicant exists for a license, the one most willing to detail and to deliver community service should be given preference.

Thank you for your consideration. I hope to be in contact with you again when LPFM becomes a reality.

Gregory V. Caliri 5/21/98

cc.

Quentin Pulfrey and the office of Congressman John Tierney (MA)
Senator Edward Kennedy, Senator John Kerry (MA)
Speaker of the House Newt Gingrich
President Bill Clinton
Congressman William Markey (MA)