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June 5, 1998

Secretary,
FEDERAL COMMUNICATIONS COMMISSION
1919 M Street, N.W.
Room 222
Washington, D. C. 20554

Re: Formal Comments R.M. 9208 / 9242 / 9246

Secretary:

Enclosed is an original and four copies of a formal response in connection with the above referenced proceeding before the Commission.

Robert Greenlee

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Before the FEDERAL COMMUNICATIONS COMMISSION

Formal Comments Concerning: R.M. 9208 / 9242 / 9246

The Commission will be considering the concerns of many community groups, individuals, and organizations who are seeking low power FM radio service and rules which can effectively promulgate such service. I am in full support of various provisions of these rulemaking efforts for the following reasons:

The Commission's FM "Table of Assignments" is an antiquated systems for the equitable distribution of FM radio service. For years, the Commissions has established various "classes" of stations using arbitrary and questionable allocation patterns including power limits and channel assignments. The original concept of having a "Table of Assignments" may have served well in the initial development of FM radio service, but today stands in the way of allowing alternative voices and choices from reaching all citizens. In addition, the Commission deleted low power (Class D) FM stations and should consider re-establishing low power service throughout the nation.

The Commission reports that it receives over 13,000 requests per year for low power or non-commercial broadcast purposes. This alone should indicate the great national interest in providing alternative voices and choices for citizens who are now virtually "locked-out" of the largely consolidated nature of contemporary commercial broadcasting. The Commission has relaxed its ownership rules to the point that rapid consolidation by group owners nearly eliminates the ability of individuals, groups, governmental agencies, educational institutions, and others from utilizing the spectrum space allocated for FM broadcast purposes.

To remedy this situation, I fully support efforts to re-examine the Commission's previous rules which allowed Class D (low power) FM stations for educational purposes and expand the ability of such services for local governments, educational institutions, groups, or individuals. Simple rules can be initiated by the Commission for such a class of service which limits ERP, power levels, antenna height, and non-interference standards and operating parameters.

The Commission could establish a priority allocation system for Class D FM operations which would establish accepting applications for service on some form of comparative evaluation. I would suggest giving local governments the first priority, followed by local educational institutions--local colleges or universities being given a preference, followed by K through 12 schools, followed by established groups such as non-profit organizations (including churches) and lastly, individual applicants.

It is time for the Commission to meaningfully respond to the growing requests for alternative voices in choices in the free marketplace of ideas and public broadcast service. I respectfully request the Commission give serious consideration to these current Rule Making proposals.

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