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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
Proposal for Creation of the Low Power FM	)	**RM-9242**
(LPFM) Broadcast Service	)	

To: Federal Communications Commission

Reply-Comments of Randolph Robert Roeder

It is my understanding that the FCC is accepting comments on RM-9242 LPFM to and including July 24, 1998. I would like to take this opportunity to sincerely thank the FCC for considering this issue and reviewing the suggestions of the general public. The concept of opening government to more participation by the citizens can do nothing but good for America.

I will begin by providing a quick look at my background. I am a 1977 graduate of Butler University located in Indianapolis Indiana. My major was Radio-Television, and my minor was Journalism. I worked for around eight (8) years in broadcasting as air talent including the position of Production Director. Because of an interest to return to my home town I entered Residential Real Estate and I am currently Broker/ Owner of Target Real Estate, Inc. located in Indianapolis Indiana.

Because of deregulation a few large corporations control most of the radio dial here in Indianapolis. Cities had a more healthy mix of local views, opinions, news reporting and local issues to consider, as well as considerably higher quality public service from the radio industry prior to the repeal of the 2 stations per market rule. Quality often suffers when a large corporation purchases a competing (same market) service because reductions in force (Rifs) occur like clockwork in the areas of local news, local sports and local public affairs. I believe LPFM can fill a void.

I strongly support the Petition For Rulemaking submitted by J. Rodger Skinner, Jr. (FCC RM- 9242). I strongly oppose RM- 9208, the 1 watt proposal. RM- 9208 will turn FM into a new CB band!

Mr. Skinner's petition is excellent, but I will offer a few suggestions that could make (RM- 9242) even better. The problem with the current status of broadcasting is very few entities own most of the facilities. I propose that no current broadcast corporate principal or licensee be allowed to apply for this new service, excluding those involved in LPTV and with no other broadcast interest. It should be open to application by anyone who currently does not have an interest in any commercial broadcast property. I believe some competitive advantage should be given to the person who finds the workable channel and delivers an acceptable application first. Mutually exclusive applications should be decided by first come, or lotteries or by competitive

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hearing. I do not agree that auctions are an acceptable system. The license should go to the currently unlicensed entity that will best serve the public, not the entity with the deepest pockets.

It is likely that the big corporations will object to (RM- 9242) because it will create locally oriented competition for their computer operated 24 hour satellite music service formats and network talk feeds. It is likely that the special interest group (NAB) National Association of Broadcasters will lobby to protect the big corporations that financially support them. The NAB is conflicted, they do not represent the general public, they support big business, therefore their position should not be viewed as fully pure.

In summation, (RM- 9242) is a very outstanding plan designed to serve the public with better radio service and no additional interference to current stations. I support Mr. Skinner's petition and hope the FCC moves to adopt.

Respectfully Submitted,

Randolph Robert Roeder

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