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July 4, 1998

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

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

To: Federal Communications Commission

Reply-Comments of F. Douglas Arnold

On this auspicious date, a date representing freedom and independence, I am formally endorsing the proposal FCC RM-9242 to make low-power FM (LPFM) broadcast service a reality in the United States. I urge the FCC, Congress and all others to move forward to make LPFM broadcasting a reality as soon as possible.

As a public affairs executive with more than 25 years experience with the media, I assure you that the evolution of corporate ownership of nearly every AM and FM station in this nation seriously curtails the distribution of important community service information in preference for pre-recorded musical entertainment or satellite downlink syndicated talk programming. Less and less locally produced programming is being broadcast in our nation today. Subsequently, the ability to broadcast the local personality, heritage and neighborhood information critical to the pulse of a community is diminished.

There can be no real comparison of this situation with other media, but imagine if you will, that your locally-published community newspaper was 70 to 90 percent national and international content provided by wire services and syndicated feature organizations. It would have the look and feel of USA TODAY, yet could easily be touted as *"locally published for the people of our neighborhood."* Yet this is exactly what is occurring today with most of our AM and FM radio stations throughout the nation. The signal is generated locally, but content is from distant mikes.

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List A B C D E

Just as the "Mom and Pop" corner markets have all but vanished because of giant corporate chain supermarkets, so have most community radio stations. These local stations once helped define and shape American villages, towns and cities.

LPFM service would offer locally owned and operated stations to once again flourish and grow in our communities. It would stimulate new commercial expansion of stations with a different style and appeal than the often sterile and cookie-cutter formats of the corporate broadcasters. It would allow families, women and minorities to participate in broadcasting — creating an broadcast environment of diversity, entrepreneurship and imagination. Audiences would have greater choice and would be able to hear a neighbor's voice on the airwaves.

As a public affairs executive, I assure you it is extremely difficult getting public service announcements on the air today. While the big corporate stations accept PSAs, they are often buried between slick, high-concept production recordings, fast-talking disc-jockeys or late hour scheduling. Community-oriented interview shows are doomed to early morning hours on Sunday — wedged between pre-recorded religious programming and canned agricultural talk shows.

Rarely does one feel like the local corporate-owned stations really know what is going on within our neighborhood. When the station does a live-remot program it does give some sense of being a part of local activities — but the live remote broadcast is coupled with commercial promotions — selling products that usually have little or no relationship with the neighborhood event.

Only in the smallest American villages do you still hear the local high school baseball game broadcast live. Very few corporate stations cover local news today; most are "rip and read" broadcasts -- the announcer simply steals headlines from the morning paper. If the newspaper reporters did not get the story correct, it is disseminated over and over again, like a virus, through a city without verification by the station's so-called news department. At least locally owned and operated stations might have a person at the microphone able to recognize and understand his or her community. A local announcer should be able to relay information based upon proximity, history and the fact they live and work in the area they serve.

In early June of this year, a tornado tore through the communities of Alton and Godfrey, Illinois, immediately north of St. Louis. Nearly every radio station in St. Louis is corporate and most do not have news departments. Most radio stations barely mentioned the damage throughout the day — and offered little or no public service information specific to the area affected. The information deemed necessary by the communities hit included *when would power be restored?, was the water supply safe?, where could we go for a hot meal?, would schools be closed?, what hospitals were open?, casualty reports, etc.* Each and every station broadcasting from St. Louis continued to run regularly scheduled programing (most of which is pre-recorded or satellite down linked from distant cities). The all-news giant KMOX-AM 1120 did a reasonable job covering the big picture aspect of the disaster, but still lacked specific answers to the questions listed above.

I firmly believe a locally owned and operated LPFM station with emergency power would have been there for the citizens of Alton and Godfrey with a neighbor's voice filled with knowledge, awareness and comprehension of the immediate local needs. *At least locally owned and operated stations should have a person at the microphone with the ability to recognize and understand his or her community and relay information based upon proximity, history and the fact they live and work in the area they serve*. Sadly, most stations had announcers who had little or no knowledge of Alton or Godfrey and those on the air were unable to effectively communicate to those in need.

A local voice for local issues. This is the most important element of LPFM. The ability to communicate to the communities we live and work within means working with a signal that does not blast out over a gigantic broadcast footprint, but rather a small, recognizable zone. It means trading mass communications strategies and homogenized programming for specialized, local communications with hometown presence. It is why the power recommendations in RM-9242 are vital to the effectiveness and viability of this proposal. Without the capability of reaching a 12 to 15 mile broadcast radius, LPFM will not be productive or useful to the communities it must serve. To re-coin an old phrase from the Sixties, *"give power to the people."*

Opponents to the LPFM proposal should be carefully considered; that is, what is the foundation for their opposition? Who are the opponents and what is the benefit to them if RM-9242 is defeated? Are they corporate giants anxious to minimize the competitive nature of LPFM? If so, is this not a potential restraint of trade issue? After all, the American system of free enterprise demands new, competitive arenas to provide better, more price-competitive products and services to the consumer. Anything less would be monopolistic, or at least unfair domination of markets by manipulative forces not working in the best interest of society.

For example, the NAB's claim of interference is a simply an invalid arguement subject to engineering examination. For many years there have been 460 full-power FM stations (grand fathered short-spaced stations) operating on 2nd and 3rd adjacent channels. These stations are operating throughout the USA and doing so with no interference complaints. None whatsoever! If these more powerful full-powered FM stations don't cause interference using the 2nd and 3rd adjacent channels, then LPFM stations certainly will not cause interference either! The record speaks volumes; let the facts be an essential part of this argument.

As well, no interference will result in the future use of In-Band-On-Channel (IBOC) digital broadcasting. In the FCC Report & Order FCC 97-276, released August 8, 1997, the FCC agreed that the use of the 2nd and 3rd adjacent channels by grand fathered short-spaced full-power FM stations would not cause interference. That's a matter of record that the NAB cannot refute. These are technologically correct facts. It is essential that these facts be made a part of the record and discussed in full and open hearings pertaining to the LPFM issue.

The proposal's goal is to create opportunities for individuals, minorities, women, small business and others with limited financial means to own and operate low-power FM broadcast stations. Our neighbors must be put back into broadcasting -- something that was lost when corporations with distant owners swallowed up hundreds of stations from coast to coast.

I highly endorse that under this proposal an applicant must live within 50-miles of the proposed antenna site and not own any other "primary service" stations. This will keep the large companies from swallowing up these channels and keep local stations local. I hope that comments will be filed at the FCC suggesting additional means of keeping these new channels for those with limited financial base. Without adequate safeguards, I fear these channels will go to wealthy corporate bidder at FCC auctions, depriving those of limited financial means of participating in the American broadcast tradition. Deletion of the 2nd and 3rd adjacent channel restrictions, as proposed in RM-9242, will make channels available in nearly every city across America, freeing up many channels for use in large markets where none are available now due to unnecessary 2nd and 3rd adjacent channel restrictions. Modern technology and engineering have created improvements in receiver designs that have been implemented since the rules were created decades ago. This makes it now possible to do away with 2nd and 3rd adjacent channel restrictions.

Let's bring our rules and opportunities up to the technological standards of the new millennium.

The LPFM station will give both voice and power back to the average American. These small community radio stations are essential to the exchange of views, news, entertainment and information within townships and villages across the USA.

As I have prepared and mailed this on the Fourth of July, I am hoping that thoughts of freedom and independence will touch those Americans reading these comments. Without LPFM broadcasting, many citizens will not have the ability to serve their communities in the same manner that a publisher does when he or she is free to buy a printing press and free to distribute a newspaper, leaflet or book. Let's broaden freedom of speech to include this wonderful technology. If it opens new markets and creates new competitive environments, that's good for business. If it provides neighborhood news, weather, emergency information, commerce and entertainment, that is better still. A well-known politician once said *"all politics is local."* I wish the same could be said for American radio service as well.

Humbly submitted this July 4, 1998, for your review and consideration in this matter,

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CERTIFICATE OF SERVICE

I, F. Douglas Arnold, do hereby certify that a true and correct copy of the foregoing "Reply-Comments on RM-9242" was sent via first class mail, this 4th day of July, 1998, to the following parties:

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