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Before the
Federal Communications Commission
Wash. DC 20554

In the matter of:
- Petition for a MicroStation radio broadcast service — RM 9208
- Proposal for creation of Low Power fm broadcast service — RM 9242

* COMMENTS *

July 17 1998

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A FABLE:

In a land where only those with at least Three gold belt-buckles are allowed to speak in public, a Merchant who owned well over a Thousand such belt-buckles began to build a bridge over a deep ravine so that he could get his goods to market faster and so that customers could easily come to his business.

A couple who didn't even have a belt, let alone any kind of buckle, happened to pass by while the bridge work was under way. Although the couple had few worldly goods, they had a good life growing their own food, raising their own animals and making and repairing their own home and all necessary equipment.

The woman noticed that those who were tying the rope to lash the bridge together were using Granny Knots instead of the much more secure Square Knots. She instinctively thought to advise the work crew but was stopped by her husband who reminded her of the prohibition against speaking. It was, he reminded her, a Violation of Law. They walked on, frustrated and alarmed that the weaker knots may endanger travelers.

As they walked, the husband noticed that the wood the bridge builders were using wasn't even good for Fire Wood and it was certainly no good for bridges. What to do?

The man dutifully filed a Petition to the King to have the speech law changed so that he could speak about important matters EVEN IF the words displeased powerful, know-it-all Merchants. While the decision process took its course, ninety-one people plummeted to their deaths when the cheaply-made bridge collapsed.

In order to deny, to themselves and to others, that they were incompetent, greedy, reckless and devoid of human empathy, the King gave the Merchant the contract to build bridges across the land. To limit controversy about this, the penalties for violating the Speech Laws were made "tougher" with higher fines and more lengthy dungeon sentences. The scribes who worked for the King and the Merchant wrote that the bridge collapse was the fault of the victims for being overweight from lack of exercise.

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SUMMARY

This Petition is to SUPPORT any and all changes in the FCC Rule Making Process that open the PUBLIC'S airwaves to Micro-Broadcasters, who, after all, are no less part of the Public than those who currently dominate the airwaves for exclusively commercial purposes.

Through certain laws that were created to benefit wealthy interests, commercial entities are considered to be a part of the Public (with attendant rights and responsibilities), it remains that the commercial entities who control an overwhelming portion of the Public Broadcast spectrum are but a TINY percentage of the overall Public. The IMBALANCE of having a small, unduly powerful element of the Public control virtually ALL of the mainstream AND sidestream communications in order to manipulate the very thoughts and lives of the rest of the public is PATENTLY UNJUST and PROVEN dangerous. It is, further, an insult to, and an attack ON, the concept and practice of representational, Constitutional Democracy.

As illustrated by the Fable on the previous page, the imbalance in tolerating such restrictions on speech is tantamount to dictionary-definition INSANITY. The word "insane" derives from "in", meaning NOT...and "sanus", meaning "healthy" (in body and/or mind). One who, by any "legal" or illegal form, silences the speech of others erases the chance to hear information that may be beneficial to ALL...<u>including the censors.</u> How can one learn of threats to health if those threats come from the powerful who control communications? How can one learn of alternatives to currently wasteful or harmful practices...if those who control communications PROFIT from wastefulness and harmfulness? It is VITAL, for the welfare of ALL, that Public communication systems be as OPEN as possible.

While they pretend to praise "Competition", the corporate powers that control mainstream communications PROVE their fear and hatred of this concept. They, essentially, ADMIT that much of what they do CANNOT compete with alternatives. Instead of competing in an Open Forum, they do all they can to make sure that the opposing team never shows up.

The opening of Low Power, low-cost, micro-broadcast channels to those who are currently denied access to commercially controlled air-waves is a crucially important first step towards creating healthy and SANE balance in the entire Broadcast system. Those who, for whatever reasons, seek to limit instead of EXPAND Public Input expose themselves as actual THREATS TO SOCIETY...including themselves and their families. If they are conscious OR unconscious of their agenda and their effects, the question of competence and sanity must be raised.

THE BROADCAST AIRWAVES HAVE BECOME THE VITAL NERVOUS-SYSTEM OF SOCIETY. Once, people only had chance to affect those nearby...those they could TALK to or, later, write to. In early days of book printing, unscrupulous figures in power sought to limit the ability of others to read or write since these skills would "level the playing field" and lessen the opportunities for high-level crimes. Of course, there would be no REASON to hide most information if the powerful were not well aware that they, above all, had a LOT to hide. Fear of exposure, then as now, prompts the powerful to take whatever steps are available to limit the communications of the Public.

HOWEVER...the powers who work to silence speech ignore the fact that society must work TOGETHER. All except hermits get essentials from others. The more all parties know, the better the flow of inter-relationships and the less there will be of wastes of time and resources.

This is virtually identical to the way the nervous system works in a Human Body. If there's a rusty nail stuck into a foot, the nervous system sends the "news" to the brain. This "bad news", or pain, starts the process of removing the nail, cleaning the wound, removing other dangerous nails and, thereby saving the foot, the leg and the life of the body.

If, say, a Nail Manufacturer did not want any "bad news" about rusty nails to hurt business...AND if this person somehow controlled the nervous system of the victim...the life of the injured person is seriously threatened. It is EXACTLY the same with the Broadcast Systems. If people are not told, by the only practical, mainstream communication system available to the population, that they are being poisoned by some industrial chemical then they are denied the ABILITY to react to protect themselves. It is nothing less than being complicit in homocide to work to deny people the RIGHT to be informed enough to defend their lives. Denying Consumer Activists, Corporate critics, government critics, developers of alternative ideas and liability law experts ample and adequate access to mainstream broadcasting (whether done by authoritarian command or by creating impossible economic barriers) is to injure and kill innocent, uninformed, unprotected people.

Similarly, if people are not informed of the GOOD NEWS about safe, benign and less costly alternatives to the things that make maximum profits for those who control mainstream broadcasting, people are then being LED towards poverty, injury or death. How NOT? The FCC must not facilitate this. Congress must not facilitate this. Although current "law" gives abstract commercial entities the same Speech Rights as human beings, even THIS does not give either side any right to control ALL the mainstream public forums.

It is the DUTY of Government to facilitate DEMOCRACY. Airwaves, therefore must be assigned appropriately: whatever percent of the public is Merchant, assign the same percentage of airwaves to Merchants. Whatever percent are Workers, same thing.

And on and on thorough the categories.

Those who have the conscience and inclination to warn and advise others of what they have learned that is CONTRARY to widespread commercial allegations MUST be given every opportunity to broadcast their knowledge. If anything is off-track or incorrect, a) there would be plenty of others on-air to make corrections and b) the commercial broadcast outlets will have no shortage of opportunity to try to make adjustments.

One must trust that the general population will detect the truth or falsehood of opposing arguments. Certainly the commercial entities are WELL AWARE of this...otherwise they would be glad to let the opposition to discredit itself with its invalid claims. The commercial opponents to an Open Media and, specifically now, to assigning Micro-broadcast bands to truly non-commercial and low power stations that permit only small, local businesses to advertise, know that it only takes just ONE small pin-prick of TRUTH to pop their swollen balloon...or one small leak to sink their Titanic. Therefore, they resist ANY form of broadcasting possibility, even ONE-percent of the space in any area, that could raise questions about their operations.

SHORT TERM THINKERS (and short-term profit takers) that the commercial entities ordinarily are, they arrogantly refuse to seek, accept or even TOLERATE any corrective advice or constructiive criticism. They are so vulnerable to this speech that they cannot even withstand NON-constructive speech that, in other situations, can be dismissed out of hand. Is it good for society, or even BUSINESS, to perpetuate a system composed of SUCH vulnerable businesses? Using corporate-sponsored "law" to make it impossible for the poor or low-income people of society to use their OWN Air Waves is a crime against everyone and everything on the planet. (This is NOT hyperbole. It is likely that, with a truly public broadcast system to report on the risks, harms and insufficient testing of chemicals, the entire planet would not now be contaminated with dioxins nor would the entire planet be threatened by the chlorine-damaged Ozone Layer. Even the children of the Chemical Company CEOs cannot escape the negative effects. The profit motive is, clearly, stronger than blood...stronger than even the vital Survival Instinct. If the complicit CEOs can do this to themselves and their own children, unrelated people don't stand much of a chance...UNLESS they have the means to communicate effectively.

POINTS OF CONCERN

1) COMMERCIAL/NON-COMMERCIAL:

At this time, even most self-described "Public" stations on tv or radio are economically dependent on and allied WITH the SAME corporate entities that control the supposedly alternative Commercial stations. This defeats the ENTIRE PURPOSE of establishing TRULY Public, non-commercials Airwaves. That the-corporate/"public" stations still CALL themselves "Public" is a blatant LIE and likely constitutes criminal FRAUD when such language is used to solicit money. Is it not part of the FCC duties to enforce laws against such on-air activity?

Ironically, there would BE no need for people to "illegally" resort to Pirate Radio, with all that entails, IF Public Broadcasting was required BY LAW ...by the Government... ...by the PEOPLE...to remain utterly un-compromised by the interests involved with commercial broadcasting. That applies to advertisers, station owners, investors, suppliers or whatever would create any reason to weaken the alternative nature of public broadcasting. Those who pushed for and then ALLOWED commercial entities to be involved in non-commercial broadcasting (knowing full well the power of money) CREATED all the harms and costs that are involved with arrests, investigations, court processes, intimidation, Constitutional challenges, loss of property, distraction from actual HARMFUL crimes (OFTEN done by the same corporate entities that enjoy mainstream broadcast monopolies) and a growing distrust and disrespect for even legitimate law. Who can TRUST a "government" that seeks to silence its OWN people? This form of "government", as we see throughout history, virtually ASKS for the rebellion. Putting a gag on the BASIC human need to SPEAK is like trying to plug a running water faucet. The water WILL come out one way or another.

2) LOCAL OWNERSHIP:

I would go further. Local ownership ought to be by More Than One Person...preferably by all who work at the station. Directorships, facilitators or any "leadership" should be on rotating basis to assure that no one person wields more than his or her share of power. Perhaps those who WANT to be leaders ought be automatically disqualified to prevent imbalance of power. But it probably doesn't matter how the local owners arrange things. Other stations will take the listeners if one station goes the "popular" commercial route. Local Ownership can simply be ensured with a LEGAL CONTRACT with the other station staff AND with any listeners who contribute financially to a station. Courts already have apparatus to handle breaches of contracts. No FCC expense here.

3) How many STATIONS OWNED BY ONE ENTITY? Exceptions can be allowed under some form of nationally agreed upon guideline. For instance, if one person owns a station in a city and spends long summers in the country, no problem is evident if the person owns one station in both places.

4) COMMUNITY SERVICE: Most stations that DO air Community Service programs ONLY address the services that do NOT displease advertisers or other economically-linked individuals. News on commercial stations is So openly serving of commercial interests that they barely bother to hide the fact.

Most stations on the air now can easily be shown to be Community DISservices since their goal and their employee DUTY is to take as much money as possible from listeners with as little interference (by critics) as possible. Warnings about product safety problems will only be aired at virtual gunpoint. Information about SAFER or superior products...or about political candidates that may "hurt" business...are not tolerated. These stations may, if they wish, continue to do Community Service by announcing Fourth of July Parades, Mall openings and the like.

The low-power, Micro-Broadcasters are already anxious to serve Communities by discussing the political issues that the other stations ignore, by playing music that is not commercially viable, by warning about unsafe products or waste sites, by offering news of interest to the majority of the population who are workers and/or which consider themselves to be environmentalists and by revealing otherwise UN publicized government uses and abuses of citizens' money.

5) If there are MORE APPLICANTS THAN SPACES: This must be decided by AN ELECTED BOARD OF MICROBROADCAST MEMBERS...much like the existing National Organic Standards Board...NOT by government officials who, in all too many cases, are conflicted by commercial interests via prospects of future jobs, stock investments or corporate-influenced Congress members.

Of course, the goal MUST be to assure maximum diversity and representation of ALL...even OR ESPECIALLY those that the majority does not like. If there's TWO applicants who wish to play the same kind of music, say, the space might be shared.

a) Lottery: Luck must not be a determining tool.

b) Filing Windows: How to inform prospects in time?

c) First Come, First Served: Same solution as above. Decided by Board of station owners/members. I suggest that all who want a space on the air apply to the Independent Board at any time. Late-comers can, of course, be invited to join with existing stations where best suited and most welcome. The more the merrier. The "club" must ONLY be exclusive in regard to Commercial entities...besides small, local businesses.

d) AUCTIONS: The money angle can, as we know, cause the intolerable EXCLUSION of those without money who ARE citizens as much as even Ted Turner...perhaps BETTER citizens if judged on how much less waste is produced by lower income people or how much less energy use, pollution and resource depletion.

(Even Auction of other airwaves is, as conducted now, a THEFT of Public Property, facilitated by industry-friendly "government" officials. The buyers do NOT share the Public Space with the public owners nor do they even pay NEAR a proper percent of profits BACK to the public owners of the airwaves. THIS is the area from which funding can be derived for the non-commercial stations, be they high or low power...but the recipients must be absolutely NON commercial. Those who advertise small, local businesses can simply pay a percentage, figured progressively, on income.)

e) POINT SYSTEM: Whatever independent Board decides.

6) DIGITAL BROADCASTING: If Digital Broadcasters use the Public airwaves, same principles as above must apply or these airwaves will end up being ALSO Unbalanced domains of only ONE group... commercial interests. All areas where digital programs are GIVEN to businesses (at fraction of value) must have complementary ALTERNATIVE, non-commercial digital station...at least one. Paid for by fees on the commercial entities, of course, in exchange for privilege of using Public Air Space.

Digital broadcasting must NOT be permitted to extinctify any unique, existing stations because only a small percent of the population will be able to afford digital receivers. The "endangered species" principles ought apply to human pursuits as well as to animal habitats. Remember that GENOCIDE refers not only to actual, physical killing of people but also the eradication of a peoples' culture or language. If a digital station is created over the 'body' of a unique Spanish (or...) language station, this IS a GENOCIDAL ACT, no matter the economic excuses offered. Any step in this direction is an atrocity.

7) LICENSING AND DECRIMINALIZATION: License is fine IF it is only a way to assure that a station is not interfering with an existing station. Cost of licensing to depend on commercial or non-commercial nature of station. FREE for non-commercial; a progressive percent of actual income for the others. (Note that public services that are called "Free" are actually not free; they are simply paid for Out of Taxes which come from everyone, even the Microbroadcasters themselves.)

Care MUST be taken to assure that applicant is not a "stealth" representative of some commercial interest(s)...say from a Corporate Servicing Think-Tank or PR firm or the like or even an activist Stock Holder hoping to keep a broadcast band out of the reach of those considered to be adversaries.

How there can be a CRIME without a tangible victim is a deep mystery. The very CONCEPT is contradictory. In any case, there ARE many more victims of CORPORATE CRIME where actual harms HAVE occurred (poisonings, accidents by recklessly made products, theft by deception, etc.) yet these actual criminals are given free reign of broadcasting opportunities as advertisers and even as owners! To say that those who are merely filling a critical void in Public Communications need to be "decriminalized" or that they are criminals is laughable...and frightening.

To free up airwaves for the under- or un-represented, it might be a simple matter of, as with driving licenses, taking the licenses away from those who used the privilege to deceive the public via fraudulent ads...or who dodged taxes on their broadcast earnings or who committed worker safety violations or hiring discrimination or the like. Cases to be given fair hearings, of course. Use Driving License laws as guide: first infraction, 30 day suspension; 2nd, 90 days; 3rd, five years... etc.

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MISCELLANEOUS COMMENTS:

* The RIGHTS OF MICRO-BROADCASTERS are only HALF of the issue. Great attention must be given to the complementary rights of LISTENERS in the Public to HEAR the diverse information, commentary, poetry and music. The Government has graciously made no law forbidding people from HEARING the material from non-commercial and alternative broadcasters... however Broadcasting the sounds ARE forbidden by many "laws" that almost-universally, seek to dance around the Constitutional protections of Rights to Speak. This is like permitting the manufacture of One-Sided coins. It is petty trickery used to create a great harm to society.

* The phrase "PUBLIC INTEREST" does NOT apply to only one segment of society, the commercial/economic interests. They, indeed, are a SMALL segment of society; a few percent. Care, henceforth, must be taken to make the rhetoric accurate and maximumly clear. If something is in the interests of Commerce and economics, SAY "Commercial Interests". If it is in the general interest of the Public (say, toxins in foods or air-pollution) SAY "Public Health Interests"...or...if this refers to those commercial interests working in health care fields, say that as well: "Commercial health Interests".

Many who oppose opening airwaves for Micro-broadcasters claim to be concerned that the Pubic may be "confused" by several aspects of the program. This language area must be the first area to be made UN-confusing.

* It has been said by opposition voices that the Pirate Radio operators in the Micro-broadcast field are "Rebels". This assertion must be rejected out-of-hand. Those who seek to DENY this Democratization of the PUBLIC Airwaves are blatantly rebelling against the principles of the US Constitution and the Bill of Rights and even against many principles of HUMAN RIGHTS.

Even the use of the word "Pirate" to describe people who only wish access to their OWN Public Air Waves is exactly backwards. The PRIVATE commercial interests who TOOK the PUBLIC air waves for their own exclusive use (by offering jobs and money to government officials and by deceiving the public via its media monopoly) are the actual Pirates...or, to use the root word, PRIVATEERS.

THE TRUE PIRATES, in modern times...to use words from Woody Guthrie...do not rob with a Six-gun, they rob you with a Fountain Pen...usually by signing over checks to "regulators".

* MONOPOLY control of the airwaves can and is used as a way to HIDE crimes by the monopoly holders. This presents a Clear and Present danger to the entire public...as can be shown by many, regular, even DAILY (if not Hourly) instances of obvious half-truths and glaring omissions. More often than not, what is of deep importance to individuals or the general public is NOT in the interests of Commercial entities to have publicized. It is a CLEAR adversarial situation. Every situation where news of corporate pollution, for instance, is delayed or left unaddressed is EVIDENCE that the commercial monopoly is NOT working in the Public Interest and, therefore, ought NOT be granted rights to the Public Airwaves...unless severely regulated with adequate enforcement by PUBLIC officials.

* PUBLIC EMERGENCY SYSTEM: There is no apparent barrier to creating a system whereby all Micro-broadcasters are contacted with advice to air emergency announcements. Such systems can even be Remote Controlled in case station in on automatic pilot.

Further, non-commercial Micro-broadcasters would likely INCREASE the Public Emergency warning benefits by warning about Unsafe Products, Unsafe Pharmaceuticals, Unsafe street drugs or other things that the Commercial Stations avoid.

ALSO...since many have turned away from mainstream radio and tv due to the lack of substantive content and the lack of diversity of music, news, poetry and everything else, the option of micro-broadcasting outlets would inevitably, inescapably draw back the lost listeners. Those who are now playing CDs or wandering through the Internet will, often, return to Broadcast airwaves and, thus, be able to hear timely Emergency Announcements that they would have certainly missed.

* ACCESS TO NEWS: Some have said that Micro-broadcasters would not have ability to gather adequate news. This is utterly untrue. A GREAT diversity of news is readily available via the Internet and alternative services.

Further, the big commercial entities do NOT have the time or inclination to investigate stories that may be inconvenient to advertisers or station owners...or small, local stories that may be of little interest outside of the Micro-broadcast area. Micro-broadcasters, then, would SERVE the public and, ironically, even the Big Time commercial news agencies by opening up stories that, otherwise, would be unknown.

The extreme problems with "news" as currently delivered even by National "Public" Radio are made clear by even casual listening on any day. Much of the "news" is nothing more than entertainment about, say, how someone makes little sculptures out of Maple Syrup or something. This is an INSULT and an AFFRONT to those whose TAX MONEY is going to pay to have useful news presented. Instead, they get maybe a long story about someone's new novel...from a Big Commercial Publisher.

(NPR says they air such things because it's "popular"; it's what "the people want". Well, McDonald's "food" is popular too, in spite of fat content, etc. Cocaine and marijuana are popular too yet NPR doesn't apply their "popularity" test to THEM. Worker's Rights are certainly Popular to the majority of citizens who still can find jobs...but there's NO programs for Workers TO BE FOUND on NPR. The gross arbitrariness of their policies is PROOF of their invalidity.)

News programs have been CUT from existing Broadcast outlets precisely because, often, they are not maximum profit makers. Some news programs are removed from the air, such as Pacifica from Philadelphia's "Public" station, WRTI, because of political/economic considerations. This WRTI situation denies ALL Philadelphia citizens the ability to hear news of GREAT local relevance and importance about Police Abuses, the Mumia Abu-Jamal case, attacks on the Homeless and many other stories. The Microbroadcasters who DID somewhat fill the gap were, as you know, also silenced. The REASON does not change the EFFECT.

* CONFLICTS OF INTEREST: Any and all FCC commissioners who have any bias or who present an APPEARANCE of bias by way of direct or family economic links to the commercial broadcast industry must a) reveal the links and b) recuse themselves from the decision-making process. The only "bias" that is acceptable is one that supports the US Constitution and the Bill of Rights and the Oath of Office to preserve, protect and defend those rights. In fact, this "bias" is a REQUIREMENT for office.

* "PIRACY": See above. Removing ALL corporate, commercial influence (except the local commercial entities in some cases) from existing Public Broadcast outlets would send many of those who need to become "Pirates" on to other pursuits...maybe IN

Public Broadcasting, maybe elsewhere. The need for the "crime" of Piracy would be eliminated instantly in most cases. This would be a definite Savings for the FCC.

* Some who oppose opening up Micro-broadcasting claim that the commercial stations are "law abiding" and that this gives them superiority or something over the "criminal" pirates. One can listen to ANY DAY of broadcasting on ANY commercial station (including NPR and affiliates) and hear commercials and funding announcements from some of the most notorious law BREAKERS in the country if not the World. It is getting hard to COUNT the number of convictions and indictments of Archer Daniels Midland which "supports" NPR programs. Or GE or Westinghouse...is there a wheelbarrow strong and big enough to carry the files of their environmental and worker-endangerment law breaking? Etc.

The only "law" broken by "Pirates", and the only law of interest that was obeyed by commercial entities was the one about PAYING for licenses. Of course, this law was created BY the commercial interests and allies precisely to exclude the alternatives and competition. It is Censorship by Dollars.

If anyone wants to raise the issue of Law Breaking, it must not be conveniently limited to this ONE questionable law. Start counting the bodies and COSTS of crimes. Compare micro-broadcasters' "rap sheet" to that of Commercial Broadcasting Interest. Consider the OVERALL Public Interest.

Further, it is to REVEAL and STOP Law Breaking that many have deep interest in non-commercial broadcasting. Although Corporate Crime harms more people than all individual and "street criminals" and although Corporate Crime COSTS FAR more than other crimes ($200 BILLION vs. $4 Billion, respectively), the public remains largely uninformed of this DUE ONLY to the unbalanced monopoly commercial interests have over broadcasting. This is, clearly, Aiding and Abetting large-scale CRIME. If unintentional, it must be ended; if intentional, it is likely candidate for big R.I.C.O. prosecution, at LEAST.

* Some who oppose Micro-broadcasting openness assert that the FCC is already over-burdened and underfuned and maY not be able to fulfill duties. However, NONE of the opposition spoke to ask for adequate funding for the FCC to bring it up to snuff and NONE of the opposition condemned the cuts in FCC funding that were promoted by Commercial Broadcast interests.

If you don't feed your cow (or if you Do feed it "rendered meat products" containing debilitating, deadly viruses) you CANNOT criticize it for falling over.

* Some have said that Cable Access, the Internet or Public Broadcasting would be adequate alternatives to Micro-broadcasting.

a) Cable Access is either not available in many locations or is threatened by actions by Commercial Broadcasters.

Further, the cost of cable hook-ups limits the availability to see the programs to only those who can afford the service. It is not an alternative. It is separate.

Cable access, also, only applies to television which limits the potential audience even more.

b) The Internet, like Cable Access, is limited to use only by those with higher incomes, not to mention the special skills. If Internet material can be broadcast over the airwaves, radio and tv, that would be a positive step.

c) Public Broadcasting, as noted above and as is well known, is essentially commercial due to "de-regulation". It doesn't even consider ITSELF to be an alternative to commercial entities any more.

Truly Public Broadcasting, not the commercial/public hybrid now on the air, WOULD be a possible alternative in some cases.

* INTERFERENCE: The FCC is welcome (and duty bound) to help assure that there is no interference between stations or with air traffic. It is my understanding that Micro-broadcasters a) do not WANT and do all they can to AVOID interference because it is inevitably counter-productive for several reasons, namely, angering others and messing up their OWN broadcast...not to mention the legal aspects. And b) cases of interference are extremely rare in micro-broadcast areas.

Interestingly, cases of interference caused by High Power commercial stations seem to be low priority in spite or their much wider negative effects.

CONCLUSION

The FCC must be an un-biased referee between the commercial and non-commercial broadcasters. It must not avoid this duty for some technical reasons. Decisions must be based not on the wealth of applicants but on the diversity they represent and on what percentage of the population they may be. The FCC must remain aware that Money represents powerful potential for tyranny just as the Majority may be tyrannical. Therefore, the rules of the FCC must be compatible with the Representative Democracy upon which the United States bases its legitimate laws and its very purpose.

If the "majority" of dollars can counterbalance or outweigh the entire remainder of other interests, it can lead to nothing but continued and worsening problems in every imaginable area.

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