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July 22, 1998

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

**In The Matter Of:
Proposal For Creation of Low Power FM
(LPFM) Broadcast Service**

Re: FCC-RM No. 9242

To: FCC/Mass Media Bureau

Reply Comments

**Submitted by Robert I. Mohamed
R.F. Communications Engineer/Radio Broadcaster**

Honorable Commissioners; Sir/Madam:

I, hereby respectfully submit these reply comments on behalf of the East/West Indian communities at large, and myself personally. It is my intention through this medium to register our strong and full support to J. Rodger Skinner's, RM- 9242 Petition to create, and establish Low Power (LPFM) Broadcast Service.

I have been involved in radio broadcasting since at the age of sixteen in my native country, Guyana, South America. I am considered among my people as a pioneer broadcaster. Since then, and now, after migrating some twenty years ago to this great country of ours my quest was always to seek and utilize all legal methods of broadcasting available, so as to continue my lifelong venture of propagating and perpetuating Indian culture, through it's music, rich heritage, and traditions.

Here in the United States of America, among it's many diverse peoples, Indians as a

minority group face a very adverse and difficult situation. An analysis will show that not even one Indian radio station exist in the United States. To obtain a regular High Powered Radio Station through the current FCC licensing process is almost impossible. My prior attempts, here in New York, to apply for a radio station was unsuccessful because after conducting an engineering survey, there were no frequencies available in the New York City Metropolitan areas, which is the home in all it's boroughs of a very large Indian community. To purchase a station also is impossible. All other possible alternatives to acquire broadcast air time, also had it's setback. The giant broadcasting corporations monopolized the airwaves. The price tag to purchase leased air time or SCA broadcasting is very exorbitant, and not all stations will change their formats to accommodate you. The affordable ones will either not reach your coverage areas and demographics or most of the time only hearing their fringe signals.

After carefully comparing all the other petitions, and analyzing their technical information, Rodger Skinner's RM - 9242 technical data and supporting facts stands out and truly makes sense. His three classes of LPFM will allow local community minded Broadcasters, individuals, and Event Broadcasters alike to choose their adequate power to reach their coverage areas, whether it's large or small markets.

In order to make LPFM work, and to truly serve it's purpose and efforts, I must emphasize the need for High enough power, as requested by Skinner. Flea Power, and a mere half-mile coverage is not worthwhile nor does it serve any community purpose. I do not foresee any competition or setbacks that LPFM will pose to currently licensed full-power FM Broadcasters.

The requested 3000 watts maximum in RM -9242 would give a maximum range of up to 15 miles and will enable LPFM broadcasters in some larger markets to support themselves with commercial advertisers. Any Small Business owner will want your station's coverage area to at least match his business trading area of 10 to 15 miles or even half of the market. That's why the old Full-Power Class A station owners wanted, and got, an increase from 3000 to 6000 watts. Here in New York City and it's boroughs for instance, with any Lower Power, my first thought was that in order to reach the targeted Indian demographic in Queens, Brooklyn, Bronx, Manhattan and surrounding areas from my proposed transmitter site in Richmond Hill, Queens, that I will have to apply for several transmitters and relay them in order to reach all the Indian communities. However, with RM-9242, 3,000 watts- 15 miles radius; one transmitter will adequately serve the entire Indian community, based upon my recent research utilizing RM-9242 Technical Data.

RM-9242 proposes, and requires LPFM owners to live within 50 miles of the station's antenna site. This is a remarkable rule and should be enacted into Rulemaking as well. With this rule the communities will benefit by having local owners, and known Broadcasters, who shares the communities needs and interests. Competition from a micro station with under 15 miles coverage simply will not significantly impact a Full-Power stations's revenue or audience. What LPFM instead will do, is that it will make small store owners and businesses who presently cannot

afford to advertise on Full-Power stations be able to afford to advertise on LPFM community stations and reaching their market areas.

LPFM will attract it's own audience, since there will be programming of community interest, local news, interviews, advertising, music and culture promotions, etc. Here in New York for instance, a large sector of the Indian community do not listen to conventional Full-Power stations because there are no programs of interest to attract them. By having an LPFM station as proposed in RM- 9242 people can educate themselves. The growing number of immigrants that come in each year can listen to government P.S.A.'s and other vital programs which can help them to adopt to their new home and American lifestyles. They can listen to broadcasters and programs alike in English and their native languages.

The creation of a Low Power FM broadcast service would give ordinary folks the ability to own and operate their own Small Radio Station and serve their communities. RM -9242 has something for everyone and at a respectable power level to make owning such a station worthwhile and affordable.

In this great country, the United States of America, where individuals can enjoy all the freedoms, including freedom of speech, I respectfully urge all of you at the FCC to uphold Section 257 of the Telecommunications Act of 1996, by promoting competition and helping small businesses to enter the broadcasting field. I further urge you to look through RM-9242 proposals thoroughly and analyze all his general issues including Small Business definitions, plans to allow minority ownership, lowering the barrier to entry into broadcasting, and the on-going Pirate radio problems, and rule in favor of RM-9242!

Thank you very much.

Respectfully,



Robert I. Mohamed

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