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Before the
Federal Communication Commission
Washington, DC 20554

Office of the Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, D.C. 20554

In the Matter of Petitions for Rule Making:

Petition for a Microstation RadioBroadcast Service	**RM-9208**
Proposal for the Creation of the Low Power FM Broadcast Service	**RM-9242**
Amendment of Part 73 of the Rules and Regulations to Establish Event Broadcast stations	**RM-9246**

Comments of:

Michael P. Garcia,
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Radio & Digital Concepts
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Radio & Digital Concepts, hereby respectfully submits the following comments pursuant to the above referenced petitions, in support of the institution of rulemaking in order to authorize the creation of specific local educational radio service as well as event broadcasting to accommodate current public demands.

Introduction

The City of Miami Beach a 7.5 stretch of on an island is visited by over 3.3Million foreign tourist and a total 9.8 Million visited Miami-Dade County last year alone according to the Department of Commerce statistics. In addition, to our tourists count, visitors attending Super Bowls, Lipton Tennis matches, Doral Golf Tournament, and the potential home for the 2000 Democratic National Convention will all cross approximately 5 bridges to enjoy the Miami Beach's and popular nightlife and sunny beach weather. The local residents, City Hall, and business leaders wish to resolve the growing pains through a plan of preventive management This plan as includes Tourist Information Radio as a proposed broadcast service under the above Petition for Rulemaking.

Radio & Digital Concepts, The Miami Beach Chamber of Commerce, as well as other civic-minded private sector wish to implement a comprehensive multilanguage tourist information service at no cost to the public sector. The local community of Miami Beach has experienced tourist slaying, cameos on America's Most Wanted, hurricanes, cruise ship fires, etc. Evidently, the world news is focused on our community, only reporting our problems and the image of a city in crises on a worldwide spectrum. In deed, Miami Beach is the gateway to the Americas. Hence, we must collectively protect our reputation abroad. Consider LPFM/AM, a perfect fit to these demands.

Our innovative concept to remedy public sector gridlock through a creative and comprehensive co-operative plan provides the following:

1) No interference to second/third adjacent channels due to proposed LPFM power limitations under all three Petitions for Rule Making

2) A compromise to the current industry norm of corporate giants controlling AM/FM airwaves and the prevention of a future antitrust situation

3) Inform and promote parking solutions, D.O.T. information, police identification, and directions to the Miami Beach Chamber of Commerce. (Please see attached map of the City of Miami Beach)

4) Keep tourist visiting Miami Beach out of high crime areas through multilanguage information

5) Welcome specific conventioneers to the city. Focus on repeat tourism by minimizing potential tourist hazards which are identifiable and remedied through LPFM

6) Work to turbo-charge effectiveness of the current 102.3 FM experimental station by the Miami International Airport Authority

Proposal

1) Tourist Information Radio Broadcast under LPFM

2) Special Event Broadcasting service under LPFM

3) Indoor and outdoor arena and stadium broadcast under LPFM

4) Ownership must be local and allow minority participation

5) Owners must be individuals, corporations, or partnerships that fall under a small business definition.

6) Maximum power allowable to be determined by area needed to be covered and with FCC approved transmitter and antenna

7) Yearly registration fees (FCC license) under $250 with application and business plan, must be inclusive of local community leaders written support

8) License should be extended through the life of FCC equipment with a minimum of 5 years

9) Licensing on a first come first serve basis, no auctions for proposed LPFM broadcasting it would only benefit corporate giants

10) Commercials acceptable in order to fund multi-language educational format

Plea to Federal Communications Commission

Under current industry and rulemaking guidelines, the priority is to maintain the radio industry solely to cater to just a few players. No matter what is proposed, public and private sector needs should take ultimate precedent. The conglomerates long-term market share strategy is maintained intact through legal gridlock and high power lobbying which unfortunately influences the FCC's rulemaking process. A democracy is sovereignty,**"for the people by the people".** Nonetheless, we pledge to educate our leaders, The United States Congress and Commissioners of the FCC, perhaps they are uneducated towards

micro-community needs, yet privy towards the selfish interest of conglomerate bottom lines. Please **VOTE YES** to the above-captioned Petition for Rulemaking submitted to the commission.

Respectfully Submitted,

RADIO & DIGITAL CONCEPTS

Michael P. Garcia
Ruben D. Aguilar
William Garcia

CERTIFICATE OF SERVICE

I, Radio & Digital Concepts, do hereby certify that a true and correct copy of the foregoing "Reply-Comments for RM-9208, RM-9242, RM 9246" respectively, was sent via first class mail, this 23rd day of July 1998, to the following parties:

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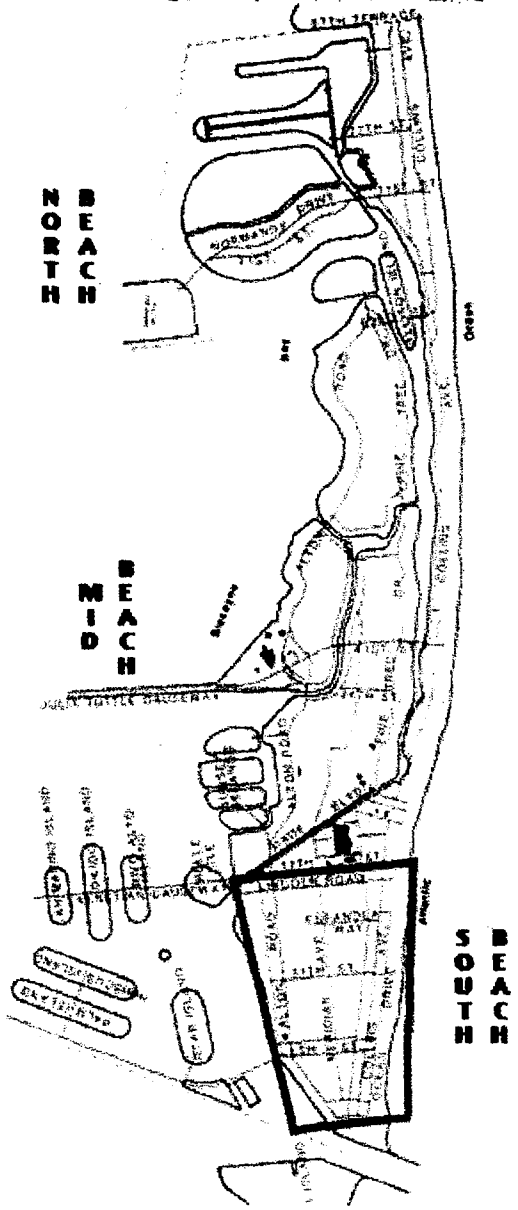
CITY OF MIAMI BEACH



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