American Friends Service Committee
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KARA L. NEWELL
Executive Director

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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
(LPFM) Broadcast Service

FCC RM-9242

To: Federal Communications Commission

Reply-Comments of Kara Newell, Executive Director
AMERICAN FRIENDS SERVICE COMMITTEE

At present, the consolidation of commercial radio stations appears to be further limiting access to the public's airwaves by those groups who might benefit most. Also being lost in the rush to consolidate is the diversity of ownership in radio stations, a hallmark of former policy.

The American Friends Service Committee (AFSC), has historically relied upon broadcasting, specifically radio, in its efforts to disseminate important messages to those who are often ignored by commercial stations. We find that there is tremendous need for programming which is aimed at assisting communities to overcome the difficulties so evident today in both urban and rural settings. These difficulties include, but are certainly not limited to, a lack of available housing, educational opportunities, discrimination, access to health care and safety in the work place: issues which are often not considered commercially viable subject matter. We believe creation of a low power FM (LPFM) radio service would help bridge the information chasm that has been created by the recent consolidation of ownership in radio stations across the country. An LPFM whose control is in the hands of minorities and low-income groups and their service providers would greatly alleviate the lack of access currently experienced by these groups. The ownership requirements, as set out in RM-9242, would protect from further consolidation of stations.

Creation of an LPFM service could help communities in ways not yet tested by large commercial interests. In rural parts of America the needs of listeners are rarely served by large commercial stations. Where commercial stations find it economically unsuitable to broadcast school board meetings, town council meetings, or even Little League

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games, an LPFM service, whose primary interest is to serve the community, could utilize radio to its fullest potential. LPFM service could also provide crucial local information to those in rural as well as urban settings who are functionally illiterate. It is true that TV could also provide local services of this kind. However, radio provides local people with a much more affordable means of broadcasting. Large public stations and public radio networks find it difficult to serve the information needs of more localized audiences. An LPFM service could bridge the gap.

The National Association of Broadcasters has raised the specter of signal interference as its primary opposition to creation of an LPFM. However, we believe that the low power requirements, as set out in RM-9242, will prevent interference of the vastly more powerful signals of large operators. Further, it is unlikely an LPFM service will affect the listeners that large commercial interests are targeting. For public stations, small community LPFM stations will only augment the work the larger stations are doing.

We urge the FCC to adopt FCC RM-9242. Again, this service will help allow access to those who have traditionally been denied access to the public's airwaves, namely minority and low income groups. The current policy allowing consolidation of commercial licenses into a few huge broadcasting entities has only exacerbated this problem.

We believe that not allowing for this service will result in the increased proliferation of low power "pirate" FM broadcasting. Current license holders will benefit much more from regulated low power stations than from growing numbers of ungovernable pirate stations.

Finally, the power levels proposed in FCC RM-9242 are very important, especially if the system is to serve rural communities and listeners.

Thank you for your consideration of this timely and important request.

Sincerely,

Kara Newell

Kara Newell, Executive Director
American Friends Service Committee

CERTIFICATE OF SERVICE

I, Kara L. Newell, do hereby certify that a true and correct copy of the foregoing "Reply-Comments on RM-9242" was sent via first class mail, this 13th day of August, 1998, to the following parties:

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Dated: August 13, 1998

Kara L. Newell

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STATE OF PENNSYLVANIA }
} SS:
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SWORN TO AND SUBSCRIBED BEFORE ME
THIS 13TH DAY OF AUGUST, 1998

Marlene B. Crowder

NOTARY PUBLIC

Notarial Seal
Marlene B. Crowder, Notary Public
Philadelphia, Philadelphia County
My Commission Expires Dec. 5, 2000