

RM 9208

From: Michelle Eyre <michelle@m-3.com>
To: A7.A7(GTRISTAN)
Date: 9/14/98 11:54am
Subject: Thank You for supporting Micro Radio

This letter may be considered "ex-parte" as it refers to a pending rulemaking proceeding.

Dear Gloria:

First of all, I would like to commend you on the appearance of your website. Being from Arizona, I like the Southwest look.

I have had the opportunity to read your remarks before the Texas Broadcasters Association on September 3, 1998.

I am very happy to hear that you are aware about the after effects of the Telecommunications Act of 1996 as it relates to broadcast station ownership.

It is also very good that you recognize that there is a need for a new breed of low power broadcast stations which would provide local service to local communities.

I am writing to you as a potential future microradio broadcaster. There is a need for this service in our community. I live in the Phoenix area, a city where it seems there are just enough owners that you can count on your fingers and toes.

One of the practices of the broadcast industry that I don't approve of is the practice of "metrocasting". Metrocasting is where an owner purchases two or more stations on the fringe of a metropolitan area, file for upgrades and then program to the metropolitan area. We have one such station pair in this town, KEDJ Sun City and KDDJ Globe, AZ.

The station programs alternative rock music and Howard Stern.

KEDJ is licensed to Sun City, one of the largest populations of senior citizens in America. I really don't think that Howard Stern's program is directed to that demographic.

KDDJ is licensed to Globe. Globe is a small town about 2 hours east of Phoenix. I have yet to see KDDJ do any program directed at the Globe/Miami area.

Keep in mind, this is not a bash against Howard Stern, this is how the big group owners are exploiting their station's city of license.

Here in Tempe, we have three licensed signals:

KUPD(FM) (97.9) programs album rock to the entire Phoenix metro area and provides mostly local originated programming geared towards the metropolitan area.

KDUS(AM) (1060) programs a satellite delivered all-sports format with very little local origination.

KCWW(AM) (1580) the valley's only full-time 50kW station is operating

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the satellite delivered "Radio Disney" format with no local origination except for legal identifications.

As you can see, Tempe would greatly benefit from micro stations. I am willing to work with you and the rest of the Commission to steer the micro radio service to be successful.

In order for this service to work, there will have to be some restrictions placed that will prevent statewide and nationwide influences from ruining this needed service.

On program origination, I feel that a majority of programming must be locally originated instead of satellite fed. Even with that, I should be allowed to present some out-of-town delivered programs. For example, I am Irish-American and this community has a niche community of Irish-Americans and British-Americans as well as the "snowbirds" that come into our community from the midwest and Canada. I would like to be able to present programming from the BBC, RTE and the CBC to these listeners who would not be able to get this service without either a shortwave radio or a connection to the internet.

My microstation would be located near the Arizona State University campus. With at least a 20 watt signal, I should be able to penetrate all of the student housing. I would be able to provide ASU students with an additional channel of communication to their community.

My microstation is in an area that is both white and Hispanic. Many people can't afford cable television service. They therefore have no access to their city. A microstation in their community would allow us to broadcast vital city information including city council meetings to those who would otherwise not have access to their city. I am currently working with the City of Tempe to secure permission to rebroadcast city council meetings in the event the Commission authorizes micro radio.

By the way, the City of Tempe does not have public access on their cable system.

Even though I have already filed comments in favor of RM-9208, I would like to make these additional comments ex-parte to you. I would like to see a micro radio service where a station would be able to operate a maximum of 50 watts in an urban area and 100 watts in a rural area. These power levels are needed in order to make this service effective.

I have just submitted an additional petition for rulemaking which enhances what is being proposed under RM-9208.

My proposal has a formal request to reallocate the spectrum between 82 and 88 MHz from television broadcasting to micro radio. This way, the micro radio stations would be able to operate at their desired power levels without "stepping on the toes" of the existing broadcasters. This extension of the FM band would open up 30 additional channels for local origination programming.

In addition to micro radio, I have also proposed that existing Class-D educational broadcasters (the original low power stations) and Travellers Information Stations would also be allowed to operate in the 82-88 MHz band.

As I mentioned in my petition, the only primary users of the 82-88 spectrum after the year 2006 will be two digital television stations in Alaska and Connecticut. Both of these stations can be easily reallocated.

I am asking that the FCC consider a more effective use of this spectrum by permitting micro radio to use this spectrum. Actually, this spectrum is available now in the top-3 radio markets (New York, Los Angeles and Chicago). It is also available here in Phoenix.

My petition would also require the radio manufacturers to provide the extended FM broadcast band on future models of FM receivers. When micro radio is approved, we really need to promote the use of 82-88 MHz.

Instead of using auctions and distance spacing to determine frequency assignments, the micro radio community would like to use frequency coordinators, similar to those used in the amateur and land mobile radio services to assign channels to local microcasters. Since microcasters may only be allowed to own a small number of stations, there would be little risk for any conflict of interest when it comes to frequency coordinations.

In my petition, I am asking the FCC to be the frequency coordinator for Arizona.

My organization, REC Networks has also formed the Arizona Microradio Association. AzMA has been designed in the event that the FCC permits me to be the frequency coordinator for Arizona. AzMA would be open to all microcasters. AzMA is already actively taking coordination requests from potential Arizona microcasters. My goal is to come to the Commission with a bandplan for 82-88 MHz in my state.

As you mentioned in your remarks, there is a difference between microradio and pirate radio. Unfortunately, many future microcasters have had to resort to pirating in order to get their message out.

REC Networks is not involved in any pirate radio activity. We are waiting for the real thing. I am hoping by this time, next year, REC-FM would be on the air providing community programming to Tempe, Arizona.

I am writing this letter to you personally. I have decided to write to you because of some recent statements you have made regarding micro radio. Thank You for your time by reading this message.

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