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RM9242

WGTB 92.3 FM
316 LEAVEY CENTER • GEORGETOWN UNIVERSITY • WASHINGTON DC 20057

August 20, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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OFFICE

Chairman William Kennard
FCC
1919 M Street, NW
Room 814
Washington, DC 20554

Dear Chairman Kennard:

I attend Georgetown University in Washington, DC, and I am writing to comment on an extremely important issue relating to radio broadcasting in America.

Presently, large communications corporations dominate the radio market, having bought several stations in every large and medium market. This situation is the result of the passage of the Telecommunications Act in 1996 that eliminated strict limits on the number of stations one corporation could own in a given market. This elimination of strict ownership limits was the result of a hugely successful lobbying effort by the National Association of Broadcasters (NAB) which is comprised, not surprisingly, of the large radio conglomerates who profited most from the passage of the Telecommunications Act. Thus, corporations with nearly unlimited resources snatched up as many stations as possible.

The result of this monopoly is a lack of choice of programming on the radio dial and the exclusion of common citizens from radio. The American people are the ones being hurt most by this trend of large, conglomerated radio station ownership. The radio market is quickly being made inaccessible to common American citizens by the NAB.

I urge you to vocally and enthusiastically support low-power FM (LPFM) radio as well as to issue a Notice of Proposed Rule-Making (NPRM) in response to J. Rodger Skinner's RM-9242. RM-9242 will allow common American citizens to own and operate a small, low-powered FM station. This dream of many Americans is an impossibility due to the rapid and near-complete consolidation of the radio bandwidth following the

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Telecommunications Act.

RM-9242's proposal to eliminate restrictions on broadcasting on 2nd and 3rd adjacent channels is feasible and necessary. There will be no interference from LPFM stations located on 2nd and 3rd adjacent channels from full-power stations. This is because LPFM stations have significantly weaker signals than full-power stations, hundreds of which actually HAVE been operating on 2nd and 3rd adjacent channels for some time with no complaints of interference. The NAB realizes that LPFM stations will not cause interference if full-power stations do not cause interference, as established on record in FCC Report and Order FCC 97-276. However, the NAB is nonetheless using this argument to trick you into believing that LPFM stations will somehow cause interference. This claim cannot be supported given the previous evidence that stations MORE powerful and operating under identical conditions proposed for LPFM stations (i. e. on 2nd and 3rd adjacent channels) have caused no interference.

Another strategy being pursued by the NAB to keep average Americans from owning radio stations is the strict limitation of the power of LPFM. The limits set forth in RM-9242 are completely feasible. Because a non-interference report from a reputable engineering firm would have to be submitted with every application for an LPFM station, it would be assured that no interference problems would occur between the station being applied for and existing full-power stations. Thus, in sparsely populated areas, a 3000 watt (the maximum primary class LPFM signal strength) LPFM station may not interfere with surrounding full-power stations (a statement that would have to be proven true by an engineering report with the submission of every LPFM station application). However, in densely populated areas, a 50 watt (the minimum primary class LPFM signal strength) LPFM signal may be the limit to ensure that the LPFM station does not interfere with full-power signals. Thus, whether in Wyoming or Washington, DC, the most important fact would be that no full-power signal is interfered with by the LPFM signal. This having been established by an engineering report included in the station application, the signal strength of the LPFM station is of secondary importance. LPFM stations in cities must have much smaller signal strengths to meet the necessity for non-interference than LPFM stations in sparsely-populated areas of America. The non-interference provision should determine the maximum strengths of LPFM signals and leave the set maximum limit at 3000 watts. Do not let the NAB convince you that set maximum limits much lower than 3000 watts are needed. This intentionally misleading claim cannot be supported if all LPFM stations must meet a non-interference provision before they even apply.

The NAB will not cease their efforts to prevent the diversification of the radio bandwidth. Radio conglomerates will fight every step if the FCC stands up for the rights and opportunities of the common American citizen. However, I urge you to resist the power of the NAB and preserve the role of all Americans in radio.

LPFM is crucial to establishing a feeling of pride in our communities throughout America. We must lower the barrier to radio station ownership for America's individuals, minorities, women, churches and community groups. We need to give America's small business owners, and residents of limited financial means, a voice on the airwaves that

are now dominated by large, impersonal corporations that care only about providing huge returns to their stockholders, to the detriment of the American communities they are supposed to serve. LPFM will help small business as well. All low-powered stations would be small businesses. These stations would in turn provide advertising opportunities for other small businesses who are not able to pay the exorbitant advertising rates of large, full-power FM stations.

Thank you for your time and please contact me if you have questions or suggestions.

Sincerely,

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