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Re:MM Docket No. 99-25

Rm-9208

Rm-9242

Sirs,

As a response to the FCC's request for public comment, The University of Southwestern Louisiana's Communication 110-6 class presents a brief response regarding the easing of radio restrictions. We put forward the opinion that the formation of independent radio cooperatives would solve problems with supply and demand, ownership issues, application processes, and assuring decency.

We also intend to state the reasons why we believe that opening up radio to independent broadcasters is timely, and at the same time, long overdue.

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Freedoms and Benefits to True Independent Radio

There is no doubt that the listener should have the right to chose between commercial and public radio, but we contend that even "public" radio is driven partially by funding from corporate interests such as Archer Daniels Midland. Therefore, we believe that listeners' choices should be expanded to include corporate, public, and independent radio. In our area, there are 10 total stations owned by two corporations. The stations' demographics cross, but no two stations have the same format. On account of this, we contend that our market poses no real variety or format competition, only 10 corporately sanitized signals. The two corporations compete, but for the stations there is no honest competition, only shared monopoly.

Another freedom would be specialization in small areas, for example, the ability of music artists to have freely privatized radio broadcasts before/during/after concerts or in specialized markets to promote their music in a more direct and personalized manner.

We would also like to mention that there are several "satellite feed" stations in our area, which we believe do damage to communities by deceiving their listeners into believing that the signal originates from their hometown. Based on this our group would put forward that this satellite consolidation by corporate entities amounts to a misuse of technology, asserted by promoting themselves as being just as "hometown" as competitive local stations. Also, though in a lesser degree, we believe that most all stations market their DJs as having some say in the selection of music or content on his or her show when, in fact, many DJs in mainstream radio have little or no say so in playlists. We assert that listeners expecting to hear honest music and or comment will actually

receive a very orchestrated corporate signal. Opening radio to independent broadcasters would allow, at the very least, for the return of some frequencies to their originally intended usage, honest community oriented programming.

In Summation

We mention the issuing of ultra-low wattage signals sparingly because we see the "neighborhood radio" option as limited, in that each large area would need to have at least one large wattage independent signal so that today's mobile radio listener would not have to choose between independent radio verses a louder and clearer professional corporate signal. "Public access television" levels the playing field for independent broadcasters in its equal clarity in that medium, and independent radio broadcasters in a strictly "neighborhood" sense would be at a serious disadvantage. Yes, the listener should have an equal choice between truly public independent radio and professional commercial broadcasts.

Finally, radio as a communication medium would benefit greatly from the opening of licenses to independent broadcasters because it would allow radio to follow the trend of all other forms of media by allowing for further specialization and independent broadcast. Newspapers, magazines, books, movies, and even television (through Public Access) have few or no restrictions on the independent publishing or broadcast of ideas and subjects. Making less sense then any of said media, keeping radio restricted to corporations amounts to trying to handcuff air. "Webcasting" should also factor in the FCC's consideration since any individual with enough bandwidth and equipment can, right now, broadcast a 24-hour signal *internationally.*

Obstacles in Opening Radio to the Public

One of the major obstacles in opening radio independently to the public is that demand may overcome supply, clouding radio in many markets. We believe that this can be solved by, instead of handing out licenses to private companies or individuals, the FCC could allow for area radio cooperatives to assure the maximization of air space. Also by separation of licenses between smaller and larger wattage signals the FCC could still regulate large commercial signals while allowing for many local independent or even non-profit radio cooperatives.

By grouping requests for radio signals into cooperatives, the FCC would also reduce the chance that demand would outweigh supply and the fear or perception that signals will be sold to the highest bidder. Since demand for radio signals would be so high, the FCC should take care to assure that signals be broadcast for no less than a prescribed number of hours per day, for example, 18. The FCC would have difficulty monitoring many small signals nationwide, so here again we believe that organized time-shares or cooperative would best facilitate effective use, control, and oversight.

In the issue of application processing, the formation of radio cooperatives would assist in even distribution based on the number of applications for licenses grouped by region. More applications would mean more time-shares for that community. We assert also that each region should be allocated a larger wattage radio cooperative in order to allow for listeners of all areas (i.e. roaming in automobiles) the choice between independent, public, and corporate radio. Also, by issuing time specific independent licenses to time-share owners of cooperatives, the FCC would assure that independent radio signals would remain for the listener at the same frequency even if specific

broadcasters lost their licenses. It is conceivable that a cooperative ownership could succeed if consisting of both a small ownership board and a larger broadcasters' board, able to step in should ownership become available.

Assuring Decency in Independent Public Radio Content

The independent freedom of not having to answer to any corporate entity will allow for true, honest signals from broadcasters which may not be suitable for all of the listeners. If current regulations regarding content remain the same, independent radio broadcasters would be inclined not to raise the suspicions and subsequent reports to the FCC from private citizens or from area competing corporate stations regarding code violations. Present level fines levied against independent radio broadcasters would almost certainly amount to a financially crippling event.

In our opinion, here again, radio time-shares or cooperatives may assure that the system the FCC already has set up to monitor content or piracy would still assure that radio signals are being used wisely. Public monitoring and corporate competitors' oversight is a pre-existing mechanism, which could be used to do the same for independent and even neighborhood radio. Also, pre-existing mechanisms such as hourly station identification regulations could be combined with a national or regional hotline number notifying the listener regularly where to report possible code violations.

We'd like to thank the FCC for the opportunity to present these comments on the subject of radio. This comment put forward by:

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