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To the Office of the Secretary:

Federal Communications Commission
Regarding Docket 99-25 - New FM Allocations
Submitted by RadioTour, P.O. Box 199 , Kilauea , Hawaii
` March 21,1999

Where are America's value systems? Our democratic values are in our public institutions. Our public institutions represent America's national values, annealed over two hundred years. They are what makes America the envy of the world - our public systems work fairly and equitably.

Site Broadcasting

FM site broadcasts are repeating short (200' to 500') broadcasts that are physically grounded to specific locations to deliver public service messages. A public service assumption always underlies a broadcast in the RadioTour system. RadioTour considers military bases(our defense), grade schools(our kids) , parks(our recreation) , historical sites(our heritage) , hospitals(our health system) , Veteran's Center(our obligations) , Toll Booths(our economy) , Truck Weigh Station(our regulations) , Gas Plazas(our lunch) , Visitor's Centers(our public attractions), Memorials(our values) , Libraries(our knowledge) , Fire Stations(our life) , Cooperative Extension Services (our food chain) , Police Stations(our safety) , Zoos(our experiences) , Fairs(our fun), Refuse Stations(our garbage), Recreation Areas (our freedom), DOT Emergency Phone sites(our service) and even Disney(our fantasies) , all should be able access an FM frequency in the airspace over their physical terrain to deliver appropriate public information to a known traveler at a known location. This system is especially applicable to the disabled and the blind.

SITE BROADCASTS ALWAYS HAVE A DEFINED local MISSION. Each public site has it's own informational values which are a vital part of the web of democracy that America has created.

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traveler tunes to another radio station since the radio. This fact has been established through Lihue Airport rental car test in 1994 by the Aloha Lei Network in Hawaii.

Part 15 FM is open to the public, everyone , every business , every public institution. How can the FCC have authorized it without providing for a frequency on which the public can use it? In Hawaii there are 55 "quiet spots on the dial" that could be used as universal frequencies in the State of Hawaii. RadioTour would like the FCC to allow the Governor of the State of Hawaii to designate a universal Part 15 FM frequency for the State, and not violate that covenant.

Hawaii has already approved the RadioTour/Hawaii frequency designation logo for State of Hawaii Transportation Department display on State roads. Hawaii has no AM traveler information stations and is therefore able to develop an entirely FM traveler information system. Part 15 FM is strong enough for most DOT applications , and certainly for Emergency Phone Site broadcasts, airport broadcasts , Truck Weigh Station instructions and Visitor Information Centers. This is perhaps the nation's last opportunity to explore FM for public site broadcasts.

Part 15 FM is called Low Power FM already. The FCC can authorize Part 15 FM Tier 2 , a One Tenth (1/10) Watt licensed transmitter. In the site broadcasting world that the FCC seeks to address in 99-25 , this is a big gun in a small package. This signal will also be more than adequate for the benificiaries mentioned in 99-25.

Sell cyberstation licenses to make money. No territory , but the station is approved for broadcasting as a radio station on a cable system or satellite program : no ground at all. The FCC can authorize unlimited numbers of Cyberstations for delivery via cable systems and satellites.

The cable industry should gladly let the FCC license their prospective users to assure credentials and huddle under the FCC's R&R. This will give new representation to the public through the core urban cable systems, and rurally through the satellite systems , where you want more

diversity that is locally inspired. This should be a pot of gold for the FCC and the cable and satellite companies. Cable, network and satellite companies need this kind of massive product input to glean and rotate stories with enough interest to warrant national pickup by the networks . Only the cable companies and the satellite companies have the capacity to feed themselves. Don't take it out on the public by depriving them of access to the most prevalent local mass media, FM radio.

The FCC can license a whole new station category, Cyberstations. The FCC can certify the Cyberstation Applicant for cable transmission and the cable company assigns them a frequency, or time slot in a frequency, for the cable company can resell station allocations to the highest bidders. The FCC should outlaw virtual stations. If you give a license for an area, the holder should have local programming, an office and a studio. This make stations more viable for sweat equity broadcasters interested in the community's values and tastes, while pushing the virtual stations into the Cyberstation category. Let them compete for cable radio space and mandate cable systems to carry locally allocated "Cyberstations" representing the various special interests noted in Docket 99-25, and any entrepenaur with an idea.

The FCC doesn't care how cable feeds itself, or how much money they make from all ends of the business. We are on the path of conflict-to-resolution by media exposure as our principal mode of problem solving, but we need to leven that with correct information at appropriate locations to inform an educated citizenry.

What the public needs is the return of an FM frequency for legitimate public Part 15 FM site information, just like Dick Tracy had. All of your 99-25 beneficiaries can be covered - all of them - every one of them - one way or the other , by Cyberstations or 1/10th Watt Site broadcast stations. Once the public has taken to the media by establishing designated frequencies, there will be additional value to private Part 15 FM station owners, who can compatibly share the same frequency.

To summarize, the FCC should reserve an FM frequency(Channel) for site broadcasts, or allow the States to do so. Secondly, the FCC should consider a 1/10th Watt FM signal as being a powerhouse for site broadcasting; by public facilities, and private or non-profit organizations , and particularly the stated beneficiaries of 99-25 who are local groups. Want to generate money? Sell Cyberstation licenses for cable and satellite deployment only. A Cyberstation license is very valuable because it will allow the owner to approach any cable or satellite network and negociate arrangements that could be national in scope. This deepens the pool of broadcasters who could rise to national prominence.

Save a piece of the real FM spectrum for real people at real sites to use when they need it for practical purposes. It is not too much to ask at this time in the FM spectrum. Authorizing the State of Hawaii to legitimize site broadcasting in the State will enable Hawaii to model FM site broadcast usage for the nation, and for international countries seeking ways to broadcast factual information to visitors and locals.

Old thinking associates media with fixed sites. New thinking acknowledges the educational needs of society at certain designated locations, to reiterate for generations the values , rights and responsibilities of a democratic society.

Respectfully submitted,

Joel Lawrence Efrein March 21, 1999