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Comments on LPFM Proposal

In the Matter of:

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1) Commercial vs non-commercial
2) Method of license issue
3) Amnesty
4) Pre-existing ownership
5) Ownership limits
6) Multiple formats on same area
7) wattage 8.) channel adjacency
9.) Spectrum increase 10.) channel 6
10.) Secondary status

Docket # MM 99-25

Comments of

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I, Robert duRivage, file these comments on March 10, 1999 in the FCC's MM-99-25 for LPFM radio.

1.) I am not as concerned with giving commercial status as I am with non-commercial and non-profit. I think that licenses should be

--should be given first to: 1.) non-commercial, then 2.) non-profit and, if any space on the broadcast area remains, 3.) commercial

2.) Highest bidder method of license issue should not pertain to non-commercial stations as this would exclude most stations who brought about the issue of LPFM relegalization on the first place. Licenses should be issued to stations who would broadcast the greatest amount of community programming with the broadest range of such. By community programming I mean: a) music & poetry & theatre by area artists b.) information about area organizations (religious, activist, union) c.) community calendar

3.) I would demand amnesty for all broadcasters who were not abusing the airwaves with profanity or explicit sexual sensationalism or violent sensationalism, or violent propoganda such as how to manufacture a biological weapon. If it were not for the "pirate" stations, this docket (MM99-25) would not even be up for comment.

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4.) license should not be issued to any entity with any business affiliation with an existing highly commercial station.

5.) Ownership should be limited to one per broadcast area and owner should reside in or near station area.

6.) There should be no two stations with similar programming in the same broadcast area eg: two Christian or Hispanic stations in same listening area).

7.) Wattage should be no more than 400 watts for this proposal as it would reduce the possibility for diversity of programming because more than one lower watt station can exist where perhaps only one higher watt station can. Also this would deter any corporate interest

8.) If first adjacent channeling is possible it support it.

9.) Any possibility for spectrum increase (Digital) should be included in the proposal.

10.) Finally, Television channel 6 should be used as well (Fill below 88)

Above all, some regulation for LPFM should be

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--for LPFM radio should exist. There is an obvious demand for it and, with more & more corporate consolidation & homogenization, a real need to protect the community interest. I thank you.

Submitted by:

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