

I strongly support the low-power FM (LPFM) proposal now before the Commission. As a former "first phones" and broadcast engineer, and an Amateur Extra-class ham operator, I am convinced that reasonable licensees, with modest oversight, can govern this service effectively. Since the LPFM service would be noncommercial, funding for oversight operations should be provided by for-profit licensees, and should not need to exceed that currently made in the amateur service. Community radio should be self-policing.

In addition, I have a master's degree in mass communications from Emerson College in Boston. My thesis research demonstrated the value of "communities on the air" in replacing the physical communities of church, friends, and peers that no longer exist due to social decay, especially in urban areas. For example, all-night talk radio such as Herb Jepko in Salt Lake City, and Bob Raleigh in Boston, build around them a community of listeners and participants who derive feelings of membership and belonging, rather than loneliness and alienation common to the silent apartments and nursing homes more typical of elder life.

Commercial radio can no longer serve this community adequately. Economic pressures severely restrict its ability to focus resources on a market with very little appeal to advertisers. However, this would be a natural service for low-power FM. Likewise, LPFM would provide voice and enfranchisement to other segments of society that currently lack market appeal to advertisers and are therefore left on the periphery of the media -- for example, farmers, fishermen, and other "old fashioned" communities and interest groups who hang on in urbanized regions (New England is an excellent example) without over-the-air access to information they used to receive from "farm news shows" and similar broadcasts.

And finally, as proven by every kid who ever waived to a camera at a baseball game, inclusion in the media is a powerful form of validation to an individual or a group. If LPFM helps keep rural America in existence by validating the experience of farmers, small town dwellers, fishermen, and high-school football in areas whose broadcasters no longer pay attention, then the minor potential for misuse or interference with money-making broadcasting is certainly an acceptable risk to bear.

Thank you for the opportunity to submit this comment.

--John Robinson, MA, W1NEB