

From: Norm Olsen <norm@mentorsoftwareinc.com>
To: A7.A7 (WKENNARD)
Date: 8/25/98 11:48am
Subject: Low Power FM Licenses

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APR 28 1999

Federal Communications Commission
Office of Secretary

Dear Commissioner Kennard:

I write to urge your support for RM-9242, Low Power FM STation licenses.

I am hearing impaired. As a result, I have difficulty enjoying movies, church, and music events. The Low Power FM solution to this problem would enable me to have my own receiver for all of these events. This provides me with two benefits other supporters of LPFM may not have emphasized:

1) Most hearing loss problems are losses at specific frequencies. In my case, my hearing starts a sharp nose dive at about 1200 Hz. My hearing aids are professionally fitted to the specifics of my hearing loss. The LPFM solution, where I can purchase my own receiver and use the same receiver in several different venues, would enable me to obtain and use a receiver tailored to my specific needs. Believe me, this difference is incredible.

2) If I had to rent a receiver at a movie theater, or use one of the receivers at church, I would be concerned about the cleanliness of the earphones. If I have my own receiver, this is not a problem.

I look forward to swift and positive action on RM-9242 which enable me to enjoy and fully participate in events which I been missing for several years now.

Norm Olsen

Docket # 99-25

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Docket # 99-25

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From: K E <eggplant@netscape.net>
To: A7.A7 (WKENNARD)
Date: 7/25/98 12:09am
Subject: Free radio

Federal Communications Commission
Office of Secretary

Hello, my name is Mike Healy and I am calling to express my concern about the recent FCC actions taken against Free Radio Gainesville in Gainesville, FL. I am a supporter of micropower radio, as the chairman claims to be, and I am disturbed that the FCC is proceeding in such an aggressive manner against a person/ organization that is agitating for more democratic ownership of media. I ask you to suspend your proceeding against Free Radio Gainesville, until the following steps have been taken:

- 1) consideration of the petitions for rulemaking on low-power FM radio has concluded,
- 2) the validity of the first amendment arguments of the Free Radio Berkeley case have been determined in the courts,
- 3) and the FCC has done it's job to reverse the tide of concentration of media ownership.

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Docket # 99-25

FEB 26 4 40 PM '98

John Santy
77 Harmony Road
Levittown, PA 19056
215-547-4597

EX PARTE OR LATE FILED

February 20, 1998

Chairman William Kennard
c/o Office Of The Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

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APR 28 1999

Federal Communications Commission
Office of Secretary

Re: Proposal Of Nikolaus and Judith Leggett of Reston, VA, and Donald Schellhardt of Waterbury, CT, For Micro-Broadcast Community Radio Stations

Dear Chairman Kennard:

The concept of low-power commercial radio microbroadcasters is an idea whose time has come. Low-power stations in Canada, and other countries, operate successfully and without causing harmful interference to other radio services.

I would ask the Commission to consider a maximum 10 watt low-power radio service allocated to quiet parts of the FM band, the frequency of which could depend upon the applicant's geographic location in the country. The problems that exist in the AM service, both in terms of the current business climate, and with interference problems, make such assignment impractical today.

There are many small businesses that do not even consider advertising on radio due to prohibitive costs. Deregulation, as in other industries, has had the complete opposite effect than what was promised. One company owning multiple stations, especially in one market, is not diversification. It does not promote competition. It has not helped lower rates (phone and cable industries, for example). We are playing a rich man's game, and all the rich men are winning. It's time the government really did something for the people. We are kept out of the mainstream media. This would give us a voice, albeit a small one. Arguments made by NAB and others of how micros would take away their business is baloney. If I sold 30-second spots on a micro-station for \$10.00, any company that currently advertises with a big station would continue to do so, and just supplement that with ads on my little station. The advantage would be to the little guys who can't afford the rates at a larger station. They would be able to benefit from the power of radio on a somewhat more even playing field.

Antenna height should be no more than fifty (50) feet above the structure on which it is mounted, but in no case higher than 200 feet. Coverage area would be limited to a specified range, perhaps 10 miles in any direction, and power output could be determined by coverage area, instead of flat-out saying 10 watts is permitted. In some areas, less output power would cover that area, in

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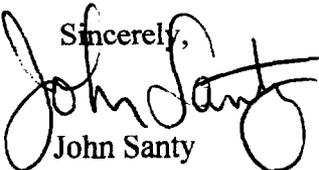
others, a little more may be needed. Limiting the coverage area to approximately 10 miles would allow stations every 20 miles or so. More than enough to satisfy most citizens who would be interested in this service. If it were possible, which I'm not sure it is, to place all applicants on the same frequency, we would have a nation-wide guaranteed source of news and information no matter what part of the country one was in. As one station fades out, another fades in.

I believe these microstations should be licensed and accountable, with an annual fee of \$500 to \$1000. This would keep it serious enough, while not being unreasonable. Two hundred of these stations across the country paying annual fees would help make up the deficit the Commission finds itself in each year. To limit travel money and expenditures of FCC Agents for necessary items is preposterous. The job is difficult enough without added constraints.

To take no action at this time, with the proliferation of pirate stations blooming, would be a ticket to continue that trend. The FCC has not put a scratch in the surface of pirate broadcasting in the country. Ineffective regulations, plea bargaining fines down to nothing, and lack of resources have insured that this agency is, and will remain, a paper tiger. I have read statements by Congressmen who have attacked your Chairmanship already. As much as I hate to admit it, some of them are right. The Telcom Act Of 1996 has not been implemented correctly in many areas. I know it is a hard job. The Commission is totally ignoring the needs of those whom they serve, the American public. There is no cable rate regulation. There is no competition in phone service. Cable companies raised their rates before competition came in, they upped the tables before anyone else got in. Phone companies are itemizing each charge on bills, and blaming the Commission for making them do it.

Get the American people behind you. That is my advice to you, Sir. That leverage may come in handy one day, when some Congressman with an axe to grind says "Let's abolish the FCC." The concept of micro-radio stations is a good one. Mark your place in history by doing something for 'We, the People.'

Thank you for allowing me to comment. The opinions expressed here are mine, and do not represent any organization or other entity.

Sincerely,

John Santy
Levittown, Pennsylvania

970656

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APR 28 1999

*Omolabo-Ajayi-Soyinka,
3058 West 9th Street, Lawrence Kansas 66049.*

Federal Communications Commission
Office of Secretary

Mr. Reed E. Hundt, Chairman
Federal Communications Commission
1919 "M" Street, NW
Washington, DC 20554

EX PARTE OR LATE FILED

Nov. 10, 1997.

Re: KAW-FM, a micro radio station based in Lawrence, Kansas.

Packet 99-25

Dear Mr. Hundt:

The purpose of my letter to you is two-fold. First, I would like state my unequivocal support for, and the continued operation of Lawrence Community Radio, KAW-FM, in Lawrence, Kansas. Second, I would like to urge you to exempt low-power stations (under 100 watts) such as KAW-FM Lawrence, from the licensing process. As you know it can cost \$75,000 to \$100,000 to set up a licensed radio station. This sum is virtually unattainable by grassroots organizations in smaller cities such as Lawrence.

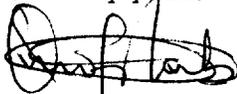
Meanwhile, KAW-FM in Lawrence is also a macro radio with powerful and progressive grass-root interests, and which contributes to the welfare of its community by providing invaluable public service. For example, KAW-FM's "Wild Earth" radio show provides information about important environmental issues of the day which other area stations barely cover. In the conservative heartland there is, unfortunately, a lack of information about environmental problems. It is not surprising then that Kansas has the most polluted rivers and streams in the country! If the public is to make informed decisions, it has to have access to as much information as possible. KAW-FM plays a vital role in filling the gaps.

Mr. Hundt, by lifting the ban on macro stations (imposed by the FCC in the 1970s), you would guarantee the widest possible diversity at the minimum amount of power. You would also ensure that public airwaves are indeed *public*: that they are available to all citizens and not only to those that have \$100,00 to set up a licensed 100+ watts station. This is the desire of many people in Lawrence, a highly diversified community with great ideas for a dynamic community.

The enthusiasm with which the people of Lawrence have embraced KAW-FM is evident in its over 100 volunteers and the numerous number of guests (over 500) it has interviewed since its inception barely six months ago. This is clearly a demonstration of the need for such a radio as KAW-FM and I urge you to please heed this need.

I appreciate the time you have spent in reading this letter and I hope you will give the points raised your utmost and immediate action. Thank you for ensuring the continued existence of KAW-FM Lawrence, and other similar macro-stations.

Sincerely yours,



Omofolabo Ajayi-Soyinka.

cc. KAW P.O. Box 1401, Lawrence KS 66044.

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Federal Communications Commission
Office of Secretary

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From: "A. Smith" <books@crabsystem.win.net>
To: A7.A7(WKENNARD)
Date: 4/29/98 10:10pm
Subject: LPPM

Please do what you can to lift restrictions on low-powered FM sites. I've worked for commercial radio for years, and would like to start a low-powered community station. Please keep me updated on your progress.

Thank You!
April Smith
425 N. Atlantic ST.
Boise, ID 83706

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Federal Communications Commission
Office of Secretary

From: "James E. Walsh" <walshvid@netdirect.net>
To: A7.A7 (WKENNARD)
Date: 4/30/98 7:37am
Subject: Short and sweet

EX PARTE OR LATE FILED

Docket # 99-25

Mr. Kennard,

A quick note of support for the commission in its openness to give authority to individuals and community based groups to operate and program lower power am and fm stations throughout the United States.

Please resist the concentrated efforts by the commercial broadcasters who not only got the majority of Christmas gifts with the Telcom Act of 1996, but are now wanting the whole Christmas dinner and will not share it with others!

In addition to providing lower power stations the right to exist, I suggest you pursue the possibility of lowering the power of all existing stations. I have never been convinced by anyone for the mega-powered stations to have such power. Why, for instance, does a WFBQ or a WTTS fm in Indiana need such awesome power and cover half the state when they are licensed to serve only Indianapolis or Bloomington? The case of WTTS for example precludes stations in a very large area from even applying for a license. Perhaps decades ago when few rural communities had stations and before the advent of satellite supplied programming this was needed. That need is now mute.

Respectfully,
Jim Walsh
Director,
Kids First, Inc.

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Federal Communications Commission
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EX PARTE OR LATE FILED

From: Shon White <kiss89fm@aol.com>
To: A4.A4 (SSEGAL)
Date: 2/10/98 10:52pm
Subject: Comments to the Chairman

95020231

Docket #99-25

Shon White (kiss89fm@aol.com) writes:

Dear Mr. Kennard,

I am writing this to chat on a personal basis. Yes I am a microbroadcaster, and I hope that you do not judge me in a harsh manner because of that. I received my FCC letter and I have obtained a lawyer in preperation for what may arise. Let me tell you a little about what I do. We broadcast high school games, local city events, interviews with Local officals, including the mayor. We have gained alot of community support. You see we are in a large market area, and the station licensed here is located 35 miles away and does nothing here. Why should a station be allowed to do that? We are a member of the local chamber of commerce, have our city business license, and state tax id. I read about all the so called hatred between the FCC/NAB against microbroadcasters. And I would agree their are some microbroadcasters wanting to serve a political agenda and not serve their communities. But alot of us are good people that want to work with the FCC to come to an agreement.

Why not take the thousands of translators and do something good for the communities they are in. I realize that coperate interests outway my voice. I am just one man wanting do do something positive for my community. The FCC was founded to protect public interests, where has that gone?? I never in my wildest dreams thought I would be an activist, But I suppose if you believe in something you should stand up for it right? Isn't that what this country was founded for. Every man is created equal. Or is it every man is equal to their income? Mr. Kennard, it is my sincerest hopes that the FCC will see microbroadcasting and Commercial broadcasting can co exist, instead of spending millions of dollars in the courts yearly, the monies could be used to benefit everyone. I have no hatred for the FCC, nor would I ever allow any slamming of the FCC on my station, just as I do not tolerate vulgarities on my station. We are all grown adults, (well except for a few microbroadcasters). !

I do not necessarily agree with the tactics of free radio berkeley. Those just create tention in an already tense situation. I would like to hear your input on this if you get a chance. Thanks for your time. Best wishes to you and your family, from me and my family.

Shon White
89 Kiss Fm

Server protocol: HTTP/1.0
Remote host: 152.163.204.139
Remote IP address: 152.163.204.139

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Federal Communications Commission
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From: Rodger Skinner <radiotv@cris.com>
To: A7.A7 (WKENNARD)
Date: 4/27/98 5:30pm
Subject: LPFM - Do The Right Thing

As the petitioner of RM-9242, which seeks the creation of a Low Power FM radio broadcast service nationwide, I ask that you do the right thing and create a LPFM service that will be looked back on in future years with pride, by millions of Americans.

I ask that you create the LPFM service with sufficient power levels, as proposed in RM-9242, that would allow a top-class LPFM-1 station to reach out 15 miles.

I participated in the rulemaking proceeding that created the Low Power Television service back in 1980 and the LPTV service was given power levels that allow a LPTV station to reach out 15 miles. The LPFM service deserves no less!

I have sensed the mood of the public over the last two years and I fear that if you create a very low (token) power level that covers only a minimal area, there will be a negative backlash and the "pirate radio" problem would only increase.

I have faith that you will use the power of your office to buck the power of the NAB that would like to see this service either not created at all or given only a token very low power level that would render a LPFM service useless. Like David was victorious over Goliath, I am confident that we shall see a LPFM service that will open the airwaves to the many deserving voices who heretofore have been denied. I pray that you will do the right thing, as it is now in your hands.

Respectfully,

J. Rodger Skinner, Jr.
RM-9242 Petitioner
6431 NW 65th Terrace
Pompano Beachm FL 33067
(954) 340-3110
email: radiotv@cris.com

Docket # 99-25

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From: jj <GTE/billy963@gte.net>
To: A7.A7 (WKENNARD)
Date: 7/29/98 7:52pm
Subject: LPFM

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APR 28 1999

Federal Communications Commission
Office of Secretary

Hello Mr. Kennard. Please try to aid in making low power fm possible. I am not going to get into all the technical reasons why it should be allowed. I did that in my barrage of comments and comments to the comments in full support of RM-9242. I only ask you that when you are in your car, hit the scan button on your fm radio and see whats out there. If you are in a large market like I am, you will hear the same commercials, the same 10 songs beaten (played) till kingdom come, and heaven help if your listening in the morning to some of the Howard Stern wanna-be's. Its bad...Real bad... no diversity, the same programming drilled into you. Bet you turned off the radio. Thats not the answer. Everybody loses. The big commercial station, the advertisers, and you because all you hear now is silence. The answer is diversity, and in this day and age of the almighty dollar, only the little guy (low power operator) will provide that diversity. I am an ordinary citizen, one deemed the "listening public" by the NAB. I do NOT agree with the NAB when they say existing stations are in the publics best interest. I am that listening public, and never was asked by the NAB if commercial broadcasters were fulfilling my needs. If I was asked, boy they'd get an earful. Please try to work something out with your friends in the FCC to allow some sort of low power fm broadcasting. Maybe you can read the support letters dealing with RM-9242. Thanks, Ted Ham II

Docket # 99-25

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From: Peter Stone <prse@troi.cc.rochester.edu>
To: William Kennard <wkennard@fcc.gov>
Date: 7/24/98 4:39pm
Subject: Comment

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APR 28 1999

Federal Communications Commission
Office of Secretary

Dear Sir:

I am writing to you in order to submit an unofficial comment on rm9208 and rm9242, a pair of petitions submitted to the FCC containing proposed rule changes concerning micropower radio. I am a supporter of the micropower radio movement, and would very much like to see the liscensing procedures changed so as to open up a portion of both the AM and FM bands to small (under 50 watts) stations. I share many of the reasons mentioned in these petitions for opening the spectrum in this manner, but would like to emphasize another. While both petitions highlighted the commerical importance of allowing small stations access to the spectrum, I am more concerned with the political effects of the opening. I believe that a healthy democratic society should give everyone who wants to participate in ongoing social and political debates an opportunity to do so. The continuing media concentration in this country, however, endangers that right, and the FCC's current liscensing procedures, by making it virtually impossible for small stations to broadcast legally, supports this concentration. I support efforts to allow more voices into the public sphere bymaking available space for small stations and by limiting the concentration of ownership of such small stations. For that matter, I encourage the FCC to enact more rigorous restrictions on concentrated media ownership in other media as well.

Pocket #99-35

I thank you for your time, and I hope you will consider my comments in your deliberation.

Yours Very Sincerely,

Peter Stone
340 S. Goodman ST #3
Rochester, NY 14607

prse@troi.cc.rochester.edu

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Federal Communications Commission
Office of Secretary

From: David Hardy <dhardy@colorado.edu>
To: A7.A7 (WKENNARD)
Date: 7/24/98 5:40pm
Subject: RM-9208 and RM-9242

Mr. Kennard;

I'd like to voice my support for RM-9208 and RM-9242 and the establishment of a microbroadcasting licensing system where FM broadcast stations under 100 watts RF can be legally licensed and regulated. I feel that the interests of local communities, events, and neighborhoods are not being adequately served by the corporate domination of FM radio space. Community radio stations are effectively muscled out of the bidding by bid-dollar interests. I understand that the FCC's charter requires it to serve the public interest primarily, but under the current system, the interests of corporate oligopolies are taking precedence over communities, citizens, minority groups, and their Constitutional Right to Free Speech.

Surely there can be an effective system for allocating bandwidth for low-power community radio, as it done in the UHF band for television or for cable. While I agree that licensing is necessary, I feel it needs to be administered in a way that accomodates even the smallest citizen-run stations, and not be cost- and beaurocratically- prohibitive.

I thank you for addressing this glaring whole in FCC policy.

Sincerely,

David C. Hardy

CC: FCCMAIL.SMTPNLM("ard@radparker.com")

Docket # 99-25

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Federal Communications Commission
Office of Secretary

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From: Lianne McNeil <march131r@pobox.com>
To: A7.A7 (WKENNARD)
Date: 7/24/98 6:18pm
Subject: FCC RM-9242 -- Low Power FM broadcasting

Dear Mr. Kennard,

Because I just learned of this issue today, I am e-mailing you to let you know that I believe that RM-9242 is a good proposal, and I urge you to support it in its entirety.

I feel that commercial FM radio stations have become too conglomerated, and that there is not enough competition. I feel that they have too much control over the music that is presented to the public. And that there are not enough opportunities for alternative broadcasting "voices". In that sense, I think that RM-9242 is a freedom of speech issue. Low power FM broadcasting will allow the "little people" or average American who wants to broadcast, the opportunity to do so. The air waves should not be held hostage by a few conglomerates.

I do not support illegal activities, so I don't condone the activities of radio pirates. But I think that if provisions are made for small-time radio operators to broadcast, then there would be no valid reason for the existence of radio pirates.

I understand some of the opposition to this bill has the concern that low power FM broadcasts will interfere with full-power FM stations. But there have been 460 full-power FM stations (grand-fathered short-spaced stations) operating on 2nd and 3rd adjacent channels for many years, nationwide, with no interference complaints. If these more powerful full-power FM stations don't cause interference using the 2nd and 3rd adjacent channels, then low power FM stations certainly will NOT cause interference either. Likewise no interference will result in the future use of In-Band-On-Channel (IBOC) digital broadcasting. In the FCC Report & Order FCC 97-276, released August 8, 1997, the FCC agreed that the use of the 2nd and 3rd adjacent channels by grand-fathered short-spaced full-power FM stations would not cause interference. That's a matter of record that the NAB cannot refute.

Sincerely,

Lianne McNeil
4675 SW 229th Ave.

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Docket # 99-25

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APR 28 1999

Federal Communications Commission
Office of Secretary

EX PARTE OR LATE FILED

From: Patrick Finnicum <pfinn@creighton.edu>
To: A7.A7 (WKENNARD)
Date: 8/4/98 12:39pm
Subject: microradio

Dear Sir,

I am sure that you have received plenty of email regarding this subject, the pro's and con's yadda yadda yadda. I am just voicing my opinion as an American citizen to legalize microradio broadcasting with proper and needed regulation.

But PLEASE make it affordable for the common citizen to exercise their first amendment rights.

Thank you for your time.

Rock #99.35

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From: <Ctpalmer@aol.com>
To: A7.A7 (SNESS, WKENNARD)
Date: 8/25/98 11:51am
Subject: license microstations

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APR 28 1999

Federal Communications Commission
Office of Secretary

Please support the awarding of licenses to microstations. It is one way around the growing concentration of media. It is one way of opening the airwaves to other voices, voices which have been suppressed since the public no longer has fair access to our airwaves. Perhaps one condition of licensing should be that these stations hold political debates for candidates. Andrea Palmer, 338 Westland Drive, Frankfort KY 40601

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Federal Communications Commission
Office of Secretary

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From: <RebbCHAIM@aol.com>
To: A7.A7 (WKENNARD)
Date: 7/24/98 2:01am
Subject: Re: Micro Power radio

William E. Kennard
Chairman
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

Dear Chairman Kennard:

As a resident of the San Francisco Bay Area, and a radio listener, I am writing to protest the Federal Communications Commission's policies concerning San Francisco Liberation Radio, an all-volunteer community station which has broadcast a wide variety of news, public affairs, and music for the last five years.

This station's programming has received many fine reviews from newspapers all over the state, and is well respected for its coverage of community events such as anti-war protests and police commission hearings. The station's regular programs consistently address issues such as human rights, poverty, homelessness, AIDS, the justice system, animal rights, and non-commercial children's programming.

I understand that San Francisco Liberation Radio broadcasts without a license from your agency because of an administrative technicality which prohibits licensing of radio stations operating at less than 100 watts, and that your agency seeks to shut down this station. The logic of this policy escapes me, not only because such stations were perfectly legal just 20 years ago, but because it is the FCC's mandate to promote broadcasting in the public interest.

As the fast-paced consolidation of radio stations in this region continues to choke off diverse voices from the airwaves, small but articulate community broadcasters are critically needed to balance content and provide public access. I fail to see how the public interest is served by media conglomerates located on the other side of the country whose programming is dictated solely

by commercial interests, market research and corporate profits. A Federal District Court in Oakland has ruled that your agency's attempt to shut down community radio stations like San Francisco Liberation Radio may constitute a First Amendment violation.

Yet, over the past year, San Francisco Liberation Radio has undergone a steady campaign of harassment from the authorities and from other commercial radio stations working hand in glove with your agency- notably KFOG and KNBR--which have spied on, photographed, and made public presentations of clandestinely gathered material in an attempt to discredit and shut down the station. And now, your staff has served San Francisco Liberation Radio with yet another notice to cease broadcasting, threatening its staff with prosecution and jail.

There are many unjust laws in this country that must be changed, and your discriminatory refusal to grant licenses to micro radio stations is one of them. I call upon your agency to halt its harassment of San Francisco Liberation Radio and to abide by its governmental mandate to promote socially responsible use of the public's airwaves in the public interest.

Sincerely,

Steve Landsmen

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Federal Communications Commission
Office of Secretary

EX PARTE OR LATE FILED

From: "Gary Guthrie" <creativity@earthlink.net>
To: A7.A7 (WKENNARD)
Date: 4/22/98 9:28pm
Subject: RM-9208/DA-98-437

April 21, 1998

Commissioner Kennard
Federal Communications Commission

Washington DC

Re: Micropower Radio/Rulemaking RM-9208

Dear Commissioner Kennard,

My name is Gary P. Guthrie. My broadcasting credentials include close to 30 years experience as a disc jockey, Program Director (twice named *Medium Market Program Director of the Year*), Consultant (saluted at the NAB*s *Breakfast of Champions* as *the father of the *Adult Rock Format**), General Manager and equity participant.

Even though I*m a by-product of Radio*s downsizing, I've been able to successfully retool in another field and watch Radio*s maneuverings from an objective point-of-view since 1996. It*s with that objectivity that I*d like to offer some opinions and thinking points regarding recent discussions and applications on *Micropower* radio.

Why Micropower Radio Might Be Worthwhile

It could replenish Radio*s service to the communities which operators are licensed to serve.

Compared to previous decades, Commercial Radio of the Nineties has escalated to a homogenized level of programming that fails to serve the interests of the community to which they*re licensed. With a lack of enforcement from one end and a lack of commitment from the other, Public Affairs programming (required number of PSAs per hour, etc.) has diminished over the years to a

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point of virtual non-existence, especially on music-oriented stations. The lack of community-oriented programming is further exaggerated by the cold shoulder many broadcasters have given their *official* city of license in favor of the façade of the larger metropolitan area 30 miles away that lines their pocketbook.

If Public Service programming were made a regulated covenant for Micropower licensees, my feeling is that it could rekindle a community*s bond to Radio and even serve as an incentive to non-PA-oriented Broadcasters to reinvest in community-oriented programming.

It could provide a wider array of programming choices.

Since the Communications Act of 1996, it appears that many multi-station owners seem to favor easy-to-operate formats that they can replicate from market to market for the sake of expense and controllability. While operating at a profit is a worthy goal, many times the audience winds up with multi-market programming that*s passed off as local.

Micropower licensing * if regulated * could offer original, innovative programming that could offer non-homogenous alternatives that might stimulate new listening and might offer an incentive to other Broadcasters to reinvest in their own product.

The Potential Pitfalls of Micropower Radio

The licensees need to be serious about Broadcasting.

It would be a sham if applicants were more concerned with acquiring a license for its upside worth on the common market than in providing a programming or community alternative. With that in mind, it might be in the best interest of the concept to require certain pledges regarding length of license, transferability and renewal.

The signal strength needs to be competitive.

The viability of anything lower than 2-3kw seems to me to be limited given the geographic spread of most cities in the Top 100 markets. I would advocate signal strength sufficient to cover a true city of license, whether that calls for 500w or 3k. That way, you achieve a nice balance between the intention of the license and the viability of the license.

Great patience needs to exist for a Micropower broadcaster to *make it.*

It's likely that some of your best licensees will have greater intent than they will have resources. Special loan programs, etc. might provide a nice springboard and cushion in the first three years of a Micropower broadcaster's service when the going is the toughest.

Special Ifs, Ands or Buts Need to Be Instituted

In order to keep the idea pure, it might be wise to mandate special requirements such as:

1. Not allowing licensees to participate in LMA or sales agreements with non-Micropower Broadcasters;
2. Reviewing Public Affairs commitments on a yearly basis;
3. Requiring a larger percentage of live or locally-originated programming than recorded or non-locally-originated programming;
4. Licenses may only be transferred to those who own no other broadcast property and satisfy special requirements as to their intent as a licensee;
5. Considering *splitting* licenses when the competency of applicants is equally strong but the number of available frequencies is limited (akin to the old WBAP/WFAA co-license).

I appreciate the opportunity to offer these comments and hope they'll be of some value to you as the Commission considers an idea that could be a blessing to the spirit of Radio.

Regards,

Gary P. Guthrie

From: J C HMB <JCHMB@aol.com>
To: A7.A7(WKENNARD)
Date: 5/7/98 11:06pm
Subject: RM-9292

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Federal Communications Commission
Office of Secretary

Dear Sir:

Just a brief comment to let you know that I support the proposal of Rodger Skinner.

I have studied his paperwork and pondered his logic. It all adds up. There IS a need * right in my own small community. We are very much under served, even though we are close to a large market. Because the rural area is spread out, we would need 15 miles to cover all the residents.

Please don't give into the big money interests. LPFM will not harm them in a financial way. But it will bring diversity of voices to radio.

And PLEASE don't be fooled by the remarks of NAB and other who say this will cause station interference. There are over 250 short spaced full-powered stations on the air without problems. The wattage proposed should not be a problem.

We have a weekly newspaper. Residents need a daily source for news and information that pertains to them. This winter we had many storms and damage that need to be addressed more than once a week!

Sincerely,

James J. Henderson
85 Creekside Drive
Half Moon Bay, CA 94019

Docket # 99-25

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Received: From [165.135.0.253] gatekeeper2.fcc.gov
By mail.fcc.gov (GroupWise SMTP/MIME daemon 4.11)
Thu, 7 May 98 23:05:07 EDT
Received: by gatekeeper2.fcc.gov; id XAA25670; Thu, 7 May 1998 23:08:15 -0400 (EDT)
Received: from imo19.mx.aol.com(198.81.17.41) by gatekeeper2.fcc.gov via smap (4.1)
id xma025663; Thu, 7 May 98 23:07:43 -0400
Received: from JCHMB@aol.com
by imo19.mx.aol.com (IMOV14.1) id WDVUa17470
for <wkennard@fcc.gov>; Thu, 7 May 1998 23:06:29 +2000 (EDT)
From: J C HMB <JCHMB@aol.com>
Message-ID: <241e74f6.355276b6@aol.com>
Date: Thu, 7 May 1998 23:06:29 EDT
To: wkennard@fcc.gov
Mime-Version: 1.0
Subject: RM-9292
Content-type: text/plain; charset=ISO-8859-1
Content-transfer-encoding: quoted-printable
X-Mailer: AOL 3.0 for Mac sub 84

From: "Rachel Perazza" <pantherwolf310@hotmail.com>
To: A7.A7(WKENNARD)
Date: 8/18/98 3:09pm
Subject: proposed rule making for low power FM stations

Chairman Kennard

I am writing you to show my support of the proposed rulemaking for low power FM. This matter has been too long in coming. With the recent consolidative of radio stations by major media corporations, the need for divergent voices on the radio dial is greater than ever. If it is true that the aim of the FCC is the most efficient and safe use of the airwaves for the public than the issue of low power FM is extremely relevant. If access to the airwaves is only for those with the financial clout to obtain it, then in truth there is no access for the majority of the public. The National Association of Broadcasters contends that a low power FM service will be chaos and will interfere with existing stations. I would like to point out to you that there have been 460 full-power FM stations (grandfathered short-spaced stations) operating on 2nd and 3rd adjacent channels for many years, nationwide, with no interference complaints. If these more powerful full-power FM stations don't cause interference using the 2nd and 3rd adjacent channels, then LPFM stations certainly will not cause interference either. The FCC is currently spending a considerable amount of time, money and manpower shutting down "pirate" or "micro" radio broadcasters. Often times this is at the bequest of licensed broadcasters in the same area complaining of interference from the pirates. In many cases the transmitters and other private property of these unlicensed broadcasters is either destroyed or confiscated by the FCC. They are sometimes fined quite heavily and charged with criminal activities. According to current conservative estimates, for every one microbroadcaster the FCC is successful in shutting down two more begin broadcasting. It would seem that the FCC could use their limited funds and manpower more effectively by establishing a low power FM licensing service than by attempting to shut down unlicensed broadcasters. Of course once the low power FM service is established and licensing has begun all those who still chose to broadcast unlicensed should be subject to all the restrictions that the FCC has in place. But low power should still be sufficient enough to meet the local broadcasting needs of a community. The present

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Federal Communications Commission
Office of Secretary

Docket # 99-25

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considerations of low power at a quarter to a half a watt are simply a bone being offered to the microbroadcasters by the NAB in hopes that they will bite. Low power standards should allow a spectrum from 5 to 100 watts. This would be a realistic and honest regulatory standard by the FCC. If the FCC truly wishes to provide the most effective access to the airways for the greatest number of people then low power FM is the most viable way to accomplish that. A team effort between the FCC and microbroadcasters could avoid the chaos the NAB is predicting. Again I voice my support of low power FM and I appreciate your honest and timely consideration of this matter.

Yours,

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Docket # 99-25

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APR 28 1999

From: Lianne McNeil <march131r@pobox.com>
To: A7.A7 (WKENNARD)
Date: 7/24/98 6:18pm
Subject: FCC RM-9242 -- Low Power FM broadcasting

Federal Communications Commission
Office of Secretary

Dear Mr. Kennard,

Because I just learned of this issue today, I am e-mailing you to let you know that I believe that RM-9242 is a good proposal, and I urge you to support it in its entirety.

I feel that commercial FM radio stations have become too conglomerated, and that there is not enough competition. I feel that they have too much control over the music that is presented to the public. And that there are not enough opportunities for alternative broadcasting "voices". In that sense, I think that RM-9242 is a freedom of speech issue. Low power FM broadcasting will allow the "little people" or average American who wants to broadcast, the opportunity to do so. The air waves should not be held hostage by a few conglomerates.

I do not support illegal activities, so I don't condone the activities of radio pirates. But I think that if provisions are made for small-time radio operators to broadcast, then there would be no valid reason for the existence of radio pirates.

I understand some of the opposition to this bill has the concern that low power FM broadcasts will interfere with full-power FM stations. But there have been 460 full-power FM stations (grand-fathered short-spaced stations) operating on 2nd and 3rd adjacent channels for many years, nationwide, with no interference complaints. If these more powerful full-power FM stations don't cause interference using the 2nd and 3rd adjacent channels, then low power FM stations certainly will NOT cause interference either. Likewise no interference will result in the future use of In-Band-On-Channel (IBOC) digital broadcasting. In the FCC Report & Order FCC 97-276, released August 8, 1997, the FCC agreed that the use of the 2nd and 3rd adjacent channels by grand-fathered short-spaced full-power FM stations would not cause interference. That's a matter of record that the NAB cannot refute.

Sincerely,

Lianne McNeil
4675 SW 229th Ave.
Aloha, OR 97007

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APR 28 1999

From: Patrick Finnium <pfinn@creighton.edu>
To: A7.A7 (WKENNARD)
Date: 8/4/98 12:39pm
Subject: microradio

Federal Communications Commission
Office of Secretary

Docket # 99-25

Dear Sir,

I am sure that you have received plenty of email regarding this subject, the pro's and con's yadda yadda yadda. I am just voicing my opinion as an American citizen to legalize microradio broadcasting with proper and needed regulation.

But PLEASE make it affordable for the common citizen to exercise their first amendment rights.

Thank you for your time.

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EX PARTE OR LATE FILED

From: "Bruce Patrick" <uncle-bruce@worldnet.att.net>
To: A7.A7 (WKENNARD)
Date: 7/29/98 6:56pm
Subject: Creation of LPFM Proposal for rule making RM9242

Federal Communications Commission
Office of Secretary

Docket # 99-24

Mr. Kennard:

I would like to ask you for your support of RM9242, a proposal for rule making that proposes the creation of Low Power FM stations.

The high costs in owning a licensed broadcast station is no secret. The only people who qualify and have access to such large amounts of money are the very rich and large corporations which own many stations in most cases.

It is time for the little guy to have a voice as it pertains to broadcast station ownership.

NAB and others do not want to see this petition for rule making to see light.

I do not condone broadcasting without a license, but I feel that cases like FCC vs Dunnifer shows that there is a need for some change in the current FCC rules. The current rules simple prohibit broadcast station ownership for the little guy like myself who do not have access to the kind of money that is required for station ownership.

Thank you very much for your time.

Respectfully submitted,

Bruce A. Patrick
Uncle-bruce@worldnet.att.net

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Federal Communications Commission
Office of Secretary

From: "Reilly M. Liebhard" <Wayne.D.Liebhard-2@tc.umn.edu>
To: A7.A7 (WKENNARD)
Date: 6/20/98 12:53pm
Subject: A sincere idea for microbroadcasting

Why not set aside 3 or 4 FM frequencies specifically for microbroadcasting?
(If I remember right, this would be a parallel to the AM "graveyard frequencies" of 1220, 1230, 1340, 1400, 1450 and 1490, set aside for local channels.) Any stations currently broadcasting on a "microbroadcasting" frequency would be allowed to continue, but there would be a moratorium on licensing new stations on the chosen frequencies, and if a microbroadcasting channel was taken up in a certain area, exceptions (i.e., licensing a microbroadcaster on another frequency) could be made on a case-by-case basis.

Thank you for considering this input.
Reilly Liebhard
lieb001@tc.umn.edu

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