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Commissioners of the Federal Communications Commission
Federal Communications Commission
445 12th St., S.W.
Washington D.C., 20554

RE: COMMENTS ON **MM DOCKET 99-25**

Dear Commissioners,

I am writing to you to urge the revision and adoption of the currently pending proposal for rule-making allowing for the licensure of independent, low-cost, low-wattage community radio stations, also known as "micro radio."

As I am sure you are aware, the last two decades have seen an unprecedented amount of consolidation within the print and broadcast media industries. As these media outlets come increasingly under the control of fewer and fewer people, the voices of citizens—especially of groups such as high school students, the elderly, the homeless, and minority groups—find fewer and fewer public places to be heard. This is unacceptable for a democratic state.

This is why I believe it is imperative that we establish a system of licensure for low-power and low-cost FM radio stations,. These radio stations should be accessible to the general public (not just well-funded organizations capable of operating in the crowded, mega-watt commercial FM arena), and should offer localized, non-commercial, community-oriented programming. These sorts of micro radio stations have the promise of being a true democratic forum, a real "marketplace of ideas," where diverse opinions can be freely expressed *without* the compulsion to satisfy advertisers and corporate owners.

However, the proposal which the FCC is currently considering shows a lack of vision and purpose for the role of micro radio. This proposal is primarily for the licensure of 1000-watt stations, which are simply too expensive for many civic organizations, churches, and schools, not to mention too large to allow for the creation of very many such stations. In fact, the simple size of 1000-watt stations would be such that in many urban areas, there would be room on the spectrum for very few, if any, such stations. In the view of micro radio as increasing the diversity of voiced opinion—which is to say, as increasing the possibility of democracy—the establishment of 1000-watt stations would be a disaster.

Micro radio activity across the United States has, historically, operated well under 100 watts or power and has, with that size, managed quite well in serving their specific communities. We should establish micro radio as primarily 100-watts or less (not as mere "secondary"

stations) to ensure that the maximum number of stations, and thus, number of citizens, will be allowed to go on the air. The radio waves are a *public* asset, after all.

Furthermore, though the FCC sees such stations as being a starting place for new, minority-owned businesses, this proposal would allow for multiple ownership of these stations which negates the central aspects of micro radio: *community based; locally operated; public access*. Allowing for multiple owners entails allowing for ownership of LPFM stations by individuals who do not live in the communities they broadcast in, who have no substantive ties to their location. The notion of "local programming" in such a scenario would be threatened by owners ignorant of the issues of importance in a given community. And, with the ability to own and operate multiple LPFM stations as a commercial enterprise, the ideal of public access and the allowance of diverse and, oftentimes unpopular, opinions to be expressed would also be clearly threatened by the inevitable need to recoup operating costs by satisfying advertisers and underwriters. We would end up with these proposed stations as nothing more than another version of commercial FM, with absentee owners broadcasting more of the same generic and bland mix of advertisements, "shock-jock" morning radio, and tiresome pop music that already clog our public airwaves.

As a citizen of the United States, and, one hopes, of a democracy, I strongly urge you to remember the FCC's duty to "serve the public interest, necessity, and convenience." This duty has been too long neglected; with micro radio, the FCC has the opportunity now to truly serve the public interest, and not merely the corporate interest. Commissioners: empower the citizens of this country to legally take part in the active process of democracy through community based, locally oriented, public access micro radio!

Sincerely,

Vincent Chiao