



National Federation of Community Broadcasters

MAIL ROOM

MAY 10 1999

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May 4, 1999

Magalie Roman Salas  
Secretary, Federal Communications Commission  
TW-A325  
445 Twelfth St., SW  
Washington DC 20554

Re: *Ex Parte* presentation in MM Docket 99-25, RM-9208, RM-9242 and  
MM Docket 95-31

Dear Ms. Salas:

On April 29, 1999 I met with Chairman Bill Kennard and Ms. Susan Fox of his office to discuss issues of importance to the National Federation of Community Broadcasters ("NFCB").

We discussed the Commission's proposal to create a low power radio service. I explained that NFCB supports a noncommercial low power radio service. In addition, NFCB favors stations that are lower in wattage (the so-called "microradio" stations) because more of those stations can be accommodated into the already-crowded urban markets. I emphasized that the new low power stations must not cause interference with existing full-power stations. NFCB also believes that fill-in translators should receive precedence over the low power stations, but that it would be acceptable for the low power stations to supersede translators that merely retransmit distant programming. NFCB supports a limit of one low power station per licensee.

In addition, we discussed the Commission's proceeding to reevaluate the comparative standards for noncommercial licensees. I explained that a speedy resolution to this proceeding is important for NFCB members that have been awaiting action on their pending applications for many years. I reiterated NFCB's position that a meaningful point system is critical, and provided a copy of NFCB's proposed point system, which is attached.

Pursuant to Section 1.1206(b), 47 C.F.R. §1.1206, an original and one copy of this letter are being filed with your office today.

Sincerely,

Carol Pierson  
President and CEO

attachment  
cc: Susan Fox  
Chairman Kennard

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List ABCDE

## NFCB Point Allocation Proposal

### Board Composition

- more than 50% of the board membership local residents (local residents are defined as those who live within station's market as defined by the Commission's ownership rules) (2 points)

### Service to Local Community

- points awarded on a sliding scale :
  - more than 75% locally-originated programming (5 points)
  - more than 50% locally-originated programming (4 points)
  - more than 30% locally-originated programming (3 points)
  - more than 10% locally-originated programming (2 points)
- station provides opportunity for members of the public to obtain air time (1 point)
- station receives 50% or more of its funding from local community sources (3 points)
- for translator applications, a credit for a fill-in translator (1 point)
- provision of new program format not available in community (1 point)

### Diversity of Viewpoints

- points awarded on a sliding scale:
  - applicant does not control any other station (4 points)
  - applicant controls one other station that is not in the same market as defined by the Commission's ownership rules (3 points)
  - applicant controls between two and five stations, none of which are in the same market (2 points)
  - applicant controls a station that is in the same market as the applicant (1 point)
- applicant is a member of a state network (1 point)

### Fair Distribution of Service

- first PTFP-eligible service (3 points)
- first full-time NCE service (2 points)
- second full-time NCE service (1 point)