

Comments re: MM Docket No. 99-25

I am glad I have this opportunity to comment on a matter of great public import, the licensing of the public airwaves. In the matter of LPFM, I wish to say firstly that I believe that the FCC should only license non-commercial low power FM stations. Furthermore, LPFM stations should be licensed only to either non-profit corporations or unincorporated associations with uncomplicated bylaws. By granting licenses in this manner, I believe that the airwaves will exhibit greater diversity of voices.

Secondly, the FCC should only license LPFM stations between 10-100 watts, not 500-1000 watt stations. The latter category is at odds with the true meaning of micropower radio, and 10-100 watts, with appropriate antenna height, is more than enough to serve a section of the community effectively.

Thirdly, and perhaps most importantly, LP100 stations should not be a secondary status service. The reason for licensing micropower stations is to give those without much funds but with a strong community service background a voice, and by relegating LPFM to a secondary status, the FCC will effectively cut off that purpose. LPFM should by all means be a primary service, unable to be “bumped off” when a station of larger power might wish to take over that frequency.

Also of grave importance is the ownership factor. No individual or entity should be allowed to own more than one LPFM station, either nationally or locally. Furthermore, owners of high power FM or AM stations, or of television stations, should not be allowed to own a LPFM station at all. This serves to safeguard LPFM against undue profiteering by those who are already in the media business. It gives other voices a chance, and stops an all out fight or auction of the LPFM licenses.

LPFM stations should not be required to provide 2<sup>nd</sup> or 3<sup>rd</sup> adjacent protection to other stations. With the advanced technology of today, the means are more than available to avoid interference with larger stations. 2<sup>nd</sup> and 3<sup>rd</sup> adjacent protection simply means less stations will be able to go on the air, regardless if the interference claims are borne out or not.

There should be a strict local ownership regulation on owners of LPFM stations. Namely, LPFM stations should only be licensed to groups or individuals who reside in the community the station would serve. How else could a LPFM station be in tune with the community it is purporting to support?

At least 90% of the programming on LPFM stations should be locally oriented, using community members and live local DJs. They should be permitted to play national music and interviews on their individual shows, but the emphasis should be on locally-originated content and talent.

The FCC should resolve mutually exclusive applications with a weighted lottery and should issue 5 year non-renewable licenses. The lottery should give extra points to those who are most in conformance with the above guidelines.

Owners of LPFM stations should not be permitted to sell or transfer their licenses. Otherwise, people will apply just to later "traffic" in licenses. Speculation of a public resource should be avoided at all costs. Speculation is completely against what community radio should be, and is completely against the public interest requirements mandated by many Congresses.

If the FCC decides to permit commercial LPFM stations, the FCC should give preference to a non-commercial applicant where a commercial and non-commercial applicant seek a license for the same channel in the same area.