

- ◆ JAMAICA
- ◆ VIRGIN ISLANDS
 - ◆ ANGUILLA
 - ◆ ST. MARTIN
 - ◆ ST. KITTS
 - ◆ BARBUDA
 - ◆ ANTIGUA
 - ◆ GUADELOUPE
 - ◆ DOMINICA
- ◆ ST. VINCENT
 - ◆ MARTINIQUE
 - ◆ ST. LUCIA
 - ◆ BARBADOS
- ◆ GRENADA
 - ◆ GRENADINES
 - ◆ TOBAGO
 - ◆ TRINIDAD
- ◆ GUYANA
 - ◆ HAITI



WPAT
930 AM Stereo

May 11, 1999

BY FIRST CLASS MAIL

Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-B204
Washington, D.C. 20554

Re: MM Docket 99-25
1000-100 watts low power FM (LPFM)
1-10 watts Microradio

Dear Sir/Madam:

I am the President and Chief Executive Officer of Caribbean Spotlight, Inc., a media company based in Brooklyn, New York. Our company currently buys broadcast time on WPAT AM 930 in New York City which we use to broadcast a live top-rated program, "Caribbean Spotlight" on Friday and Saturday nights. This program targets the large, growing and diverse Caribbean community in the New York metropolitan area. Our program is a mixture of local community events as well as Caribbean news and music. It began in 1983 on a college radio station in New Jersey as a variant of the present program. At that time, the program was on the air for 3 hours per week. Today however, because of increased demand for this type of programming, Caribbean Spotlight is on the air for 7 hours per week. Indeed, our listeners are requesting that we go on the air 7 days a week. Unfortunately, we are currently unable to do so because of the prohibitive costs of buying airtime in New York City.

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Because of the potential they hold, Caribbean Spotlight, Inc. enthusiastically supports the FCC's desire to license new 1000 watt and 100 watt low-power FM (LPFM) radio stations as well as the 1 to 10 watt "microradio" stations. Indeed, these new stations are the perfect vehicle for entities such as ours to continue to serve their communities. On behalf of Caribbean Spotlight, Inc. and the vibrant community it serves, I welcome this opportunity to comment on the FCC's proposed actions. I will restrict my comments to the specifics of the Notice of Proposed Rulemaking issued on January 28, 1999.

I do not foresee any potential adverse effects from LPFMs to future digital radio development. Indeed, since digital bands by definition are more accurate, interference from LPFMs should be minimal or non-existent. I agree with the FCC's proposed maximum effective radiated power and antenna height, although I wish that the service area radius were slightly larger.

I agree that most radio station service rules should apply to the new LP100 and 1-10 watt microstations because of their size and status as step-children of other, full-powered radio stations. I also agree that these new stations should not be permitted to act as translator stations which merely retransmit the programming of full-power stations. Indeed, to allow such translator services would seem to defeat the very purpose of this proposal.

Although the cost to operate these new stations would be less than full power-stations, these new stations should nonetheless be permitted to generate revenue through advertising. It is also my belief that the population in the target areas can sustain an advertising base of presumably small business, community groups and businesses seeking a niche market. I do not think these LPFM stations should be strictly non-commercial and/or devoted to educational institutions. After all, there already exists public radios in a large part of the country as well as college and university-run stations.

Inasmuch as these new stations are meant to be available to a wide range of applicants, I agree with the proposition that existing broadcasters should be prohibited from owning or establishing joint sales and marketing

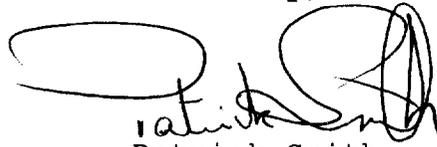
agreements with LPFMs. However, because of the proposed reach of these stations, it may be necessary to permit ownership of multiple stations particularly to operators in large, multi-cultural metropolitan areas such as New York City.

Generally, I agree with the proposed electronic filing. However, I think that there should be longer window for the filing of applications. Also, because some applicants may not have all the necessary documents at hand, I disagree with a first-come, first-served system. I suggest however, that preference be given to applicants with a demonstrated history and commitment to community-oriented broadcasting.

I hope that the above comments assist the FCC in its rulemaking function.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Smith". The signature is stylized with a large, sweeping initial "P" and a circular flourish at the end.

Patrick Smith
President