

May 25, 1999

Federal Communications Commission  
Washington, DC 20554

In the matter of the Creation of a Low Power Radio Service

**MM Docket # 99-25**

RM-9208

RM-9242

I'd like to add my voice to those who have already commented in favor of establishing low power FM radio service.

I've worked in magazine publishing for over 18 years, and lately I've become disenchanted with the direction this business has taken. Heightened competition has increased the pressure to expand revenues. The need to draw a particular audience demographic and, correspondingly, the advertisers that want to reach that audience, has become the overriding factor in story selection and overall editorial content. The crushing need to make greater and greater amounts of money has become paramount. It doesn't matter how well made a magazine is, how well written its articles are, or how pleasing to the eye its designs are—if it doesn't earn piles of money, it won't last long in today's marketplace.

In general, I believe the same can be said of the products created by all major media. Now don't get me wrong, I'm not against those who believe that the primary purpose of business is to make money. It's just that the product of the media business is entertainment, and I feel very strongly that this particular product, perhaps more than most, suffers when the main reason for producing it is to maximize profits. That's why the phrase "Lowest Common Denominator" quite aptly describes the programming philosophy of most commercial radio stations today. And I think that's a shame.

But here's where LPFM comes in. In my opinion, this service will reopen the airwaves to people who want to provide radio as entertainment that is truly entertaining. In addition, by their very nature, these stations will be much more responsive to the needs and desires of their local listening audience than any mega-commercial station could ever hope to be. LPFM will also open up new avenues for local businesses to reach potential customers, expanding commerce at a level that the current commercial radio structure doesn't really serve.

What follows are recommendations that I feel are crucial if LPFM is to reach its maximum potential.

1. Both commercial and non-commercial stations should be permitted. Those individuals and organizations who want to operate a station without commercials should be given an opportunity to do so. At the same time, those of us who see this as a chance to operate a small business while also providing entertainment and services on a local scale should not be shut out.

2. Licenses should be renewable after seven years. It is hard to imagine that people will invest all that it takes in time, energy, and money to get a station up and running and, if fortunate, make it self-sustainable if there is a preset limit on the length of time it may stay in operation.
3. LPFM stations should be protected from being bumped off the air by other stations, and should not be permitted to bump other stations themselves.
4. The 2nd and 3rd adjacent channel restrictions should be dropped for LPFM stations.
5. Ownership of LPFM stations should be local (within 50 miles of a station's listener community) and be limited to individuals, small businesses or small non-profit organizations. Ownership of a station should be limited to "one to a customer." At the same time, existing broadcasters and their subsidiaries should not be allowed to invest in or own LPFM stations. The goal is to have local programming created by the owner/operator that will serve the station's listener community.
6. All three classes—LP-10, LP-100, and LP-1000—discussed by the FCC in MM 99-25 should be approved.

Lastly, I'd just like to emphasize that I agree with those who see LPFM as providing an alternative to mainstream commercial radio. The limited power and reach of LPFM stations would make direct competition with mainstream radio an enterprise with limited possibilities for success. Instead, LPFM stations will serve those listeners who no longer find mainstream radio to their liking, and niche formats will flourish when all sides of the economic equation are reduced to manageable segments of local markets.

I'm excited by the possibilities that the proposed LPFM service will create, both as a listener and as one who hopes to be a participant in helping LPFM reach its greatest potential, and I'm eagerly waiting for this service to become a reality.

Respectfully submitted,

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