

I represent several groups which provide radio or public access or=20 commercial cable television programs for Brazilian-American communities in=20 the northeastern United States. Your proposal is of great interest to us.=20 Although this community is not small in the aggregate -- probably over=20 150,000 people in NJ, NY, CT, and MA =97- its relatively recent arrival and=20 distribution in concentrations of 5,000 to 25,000 within neighborhoods or=20 communities in larger, urban areas have limited media access to public acces= s=20 cable, or renting time on radio or commercial cable. LPFM would likely permi= t=20 the emergence of a small network or string of stations that would serve our=20 communities far better than the current alternatives.

Areas of particular concern to us would be that an individual or group be=20 able to control multiple stations, that there be no residence requirement=20 (e.g. owner must reside within fifty miles of the station), that the station= s=20 may be commercial, and may share or simulcast programming for at least part=20 of the broadcast day. Absent these provisions it would be difficult to=20 produce good quality programming on a sustainable basis for a community with=20 multiple, relatively small, nuclei (i.e. concentrations of 5,000-25,000=20 people in Somerville and Framingham, MA, Danbury and Bridgeport, CT, Port=20 Chester and Mount Vernon, NY, and Elizabeth and the Ironbound area of Newark= ,=20 NJ). Because these communities are also situated within larger metropolitan=20 areas, deleting second and third adjacent channel restrictions is important=20 to us, also.

Although I am writing on behalf of one ethnic group, I suspect that many othe= r=20 ethnic and racial minority groups and organizations would share our=20 enthusiasm for the prospect of being able to create viable=20 "microbroadcasting" for our communities based on the proposed LPFM=20 regulations.

Sincerely,
Michael Boyle
Attorney at Law