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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D. C. 20554

In the Matter of )  
Creation of a Low )  
Power Radio Service ) MM Docket No. 99-25  
) RM-9208  
) RM-9242  
)  
)

**Comments of**

**The Detroit Radio Information Service (DRIS)**

**southeastern Michigan's radio reading service for the blind and print-impaired**

*"On behalf of the DRIS staff, 145 community volunteers and 100,000 metro-Detroit households...that have access to DRIS programming 24-hours a day, seven days a week, we urge the commission to drop the LPFM proposal."*

The Detroit Radio Information Service (DRIS) would like to bring to the Commission's attention our concerns with approving low power FM (LPFM) stations. DRIS is one of more than a 150 "radio reading" services for blind and print-impaired persons in the United States. Most are using FM subcarriers (FM/SCA) to disseminate their programming to qualified clients. DRIS has broadcast since 1978, using the 67 kHz subcarrier of public radio station WDET 101.9 FM,

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licensed to Wayne State University in Detroit, Michigan. DRIS helps broaden the public radio mission by providing increased programming to a specialized segment of the community.

The subcarriers radio reading services use could be negatively impacted should the proposal for LPFM be enacted.

While we understand your desire to be responsive to prospective minority operators, stations like ours already serve a minority population—Americans with disabilities who cannot see, hold or comprehend standard printed matter. We serve the community at large by helping a typically under-served group gain access to vital information other Americans take for granted. Radio reading services support independent living and the right of every citizen to have equal access to the public process. DRIS makes accessible the verbatim reading of more than 100 newspapers and magazines a week, plus newsletters, circulars, brochures and public service announcements. Local issues-based programming on DRIS focuses on the unique needs of disabled listeners and offers other organizations the ability to reach their client base through the closed-circuit radio system. DRIS provides a targeted on-air forum for the disabled community.

Studies have shown that as many 25% of all senior citizens lose vision to the point they cannot read. Others cannot read because of a physical or cognitive disability, including learning disabilities that may result in lifelong illiteracy. Such disabilities cross all racial, ethnic and religious boundaries. This population often is low income and elderly persons are frequently uncomfortable with new technology. These citizens are the ones helped by the radio reading service industry which offers a familiar, easy to use method for information access.

DRIS programming provides a vital link between the print-disabled population and the rest of the community. It offers shut-ins some of the services typically found at a community center and opens the world to those who are particularly vulnerable to isolation and depression. The volunteer readers who make radio reading possible provide a critical social connection for radio reading clients, many of whom are frail and/or elderly.

The LPFM proposal has the potential to hurt radio reading services and the listeners who rely on them. This is not a small number of individuals considering that Americans over 60 represent the fastest growing segment of the population. Subcarriers are by design fragile radio signals. Radio reading services already put up with a narrow bandwidth in order to deliver cost-effective service. If the commission allows LPFMs to begin operation on adjacent channels, many radio reading services could suffer from unrelenting interference and thousands of listeners would lose the ability to use the specially built subcarrier receivers that have been loaned to them free of charge by their local radio reading service.

There are no assurances that the manufacturers of SCA receivers could adapt to overcome the excessive static and cross talk LPFM could cause. And no radio reading service is in a financial position to replace the radio receivers already in use. This alone, would be devastating to DRIS. It would be analogous to stealing the newspaper from our listeners' doorsteps, restricting their use of timely consumer information and barring the door to them at public forums.

On behalf of the DRIS staff, 145 community volunteers and 100,000 metro-Detroit households, hospitals, senior centers, nursing homes, retirement villages and schools that have access to DRIS programming 24-hours a day, seven days a week, we urge the commission to drop the LPFM proposal and look for other ways to assist minorities and new low budget radio operators. Minimally we ask that before proceeding, the FCC fully explore the potential consequences of the LPFM proposal. Please do not disenfranchise one group to provide uncertain aid to another.

Respectfully,



Kimberly K. Walsh

Director

Detroit Radio Information Service (DRIS)

c/o WDET-FM, Wayne State University

4600 Cass Avenue, Detroit, MI 48201

*Submitted on: May 21, 1999*

cc: The Honorable James Barcia  
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The Honorable Carolyn Cheeks Kilpatrick  
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The Honorable Carl Levin

# DRIS FOCUS

Newsletter of the Detroit Radio Information Service for the Print-Impaired

WDET-FM/SCA

Wayne State University, Detroit, MI

Winter 1999

## 1998 Annual Report Edition

August 1998 marked DRIS' 20th Anniversary. The occasion was highlighted at the DRIS Annual Recognition Reception held on October 29, 1998 where more than 70 listeners, volunteers, donors and friends joined to celebrate the achievements of two decades.

The following volunteers were singled out for recognition of their 1998 contributions: **Doris Lippo** (Detroit Free Press host) received the Listener's Choice Award. **Jane Strand** (American Way host), **Ted Johnson** aka Wesley Quarles (Detroit Free Press host), and **Alice Morgan** (Detroit News & Free Press host/office assistant) received Elizabeth M. Wight Awards for top reader hours. Intern **Winnetra Sawyer** received the Wight Award for top studio hours.

The Mark C. Otis Award for special service went to **Wensdy White**, a long-time Detroit Free Press reader. In addition to serving on DRIS' Advisory Board, White raised the most pledges during the Walk with Art Walkathon and the Phonathon Campaign.

Recognition certificates went to Lion Dee Carter, Lion Bob Miller, George Thompson (Detroit News host) and Ray Delfer (listener and Advisory Board member). Special thanks go to the Cathedral Church of St. Paul, Jackson Catering, the Detroit New Center Lions Club, Fitness Works, Very Special Arts-Michigan and the St. Regis Hotel for making the reception and event prizes possible.

Last May, with the help of the Public Relations Society of America (Detroit), the first-ever DRIS Celebrity Readathon debuted. The event raised \$9,000 and brought more than a dozen media guests to the airwaves. The 1999 Readathon is scheduled for May 17-22.

Other fund-development efforts also were successful which resulted in a year of excellent service and growth. Last year, 126 new clients became DRIS listeners. Nine senior centers and the City of Lathrup Village added DRIS as well, making DRIS programming available to many additional listeners. DRIS ended the year in discussion with Community Media Network, the nonprofit group that provides Public Access programming over cable TV to some 75,000 homes in southern Oakland County. The DRIS audio signal will now be available on TCI Channel 52 during the hours when television programs are not scheduled.

Many thanks to everyone who has contributed to DRIS' success.

# Year in Review

## 1998 Expenses

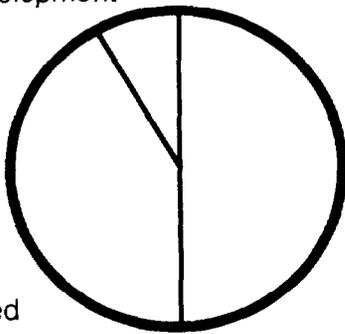
Program Staff.....	100,946
Programming/Receivers.....	10,429
Communications.....	4,194
Volunteerism.....	79
Training/Conferences.....	552
Total Expenses.....	\$116,200

## 1998 Revenue

Foundations .....	12,600
Business/Corporate .....	17,905
Individuals/Listeners .....	21,643
Service Clubs .....	7,075
Events .....	4,209
Special Projects .....	52,857
Total Revenue .....	\$116,289
Year End Balance .....	\$2,089

## Expenditure by Functional Area

7% Administration/  
Fund Dvelopment



50%  
Programs  
and Services

43%  
Restricted  
Programs

## In-Kind Support

**WDET/WSU:** \$36,000 (administration and technical support, facilities, use of radio sub-channel).

**Volunteers/Interns:** \$60,967 (readers, clerical, studio work, community outreach).

**Additional Donations:** \$1,800 printing services, more than \$1,500 in newspaper and magazine subscriptions, \$300 office supplies, \$600 coffee and coffee supplies.

## DRIS Staff

Kim Walsh.....	Director
Calvin Euseary II.....	Operations Associate
Michelle Raiyn.....	Volunteer/Outreach Coordinator
Ronier Golightly.....	Evening & Weekend Assistant
Anita Hinks, Fran Burke.....	Volunteer Office Assistants
John Wyatt, Katrina Banks, Eric Martin.....	Interns

Detroit Radio Information Service (DRIS): c/o WDET-FM  
4600 Cass Avenue, Detroit, MI 48201; Phone (313) 577-4146  
Studio Line: (313) 577-3322; Program Hotline: (313) 577-4207

# Thanks for your Support!

We would like to express our deepest appreciation to the following Fiscal Year 1998 sponsors (October 1, 1997 - September 30, 1998). Their support allowed us to provide and expand radio reading service for the blind and print-impaired residents of southeastern Michigan. If you are interested in supporting DRIS, please call Kim Walsh at (313) 577-7684.

## Major Contributions: \$5,000 and up

City of Detroit Neighborhood Opportunity Fund - "Outreach" Project  
Department of Education/Developmental Disabilities Institute - "Bridges" Project  
Area Agency on Aging 1-B

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 from Mary & Fred Aoun  
 from Barbara & Daniel Fiantaco  
 from Maida & Morton Genser  
 Christine Hugo  
 from Kathleen M. Durbin  
**Judith Krandall**  
 from Steven Raimi  
**Robert J. McGahey**  
 from Beatrice M. McGahey  
**Felecia Ryba**  
 from Stephen E. Ryba  
**Theodore Zipser**  
 from Helen Zipser

### *In Honor of*

**Eddie Edwards**  
 from Carolyn Edwards  
**Martha Griffiths**  
 from Rita Sue Cohen  
**Josephine James**  
 from Madah Derhammer  
 AKA Maida Tuttle  
**Edward Hart**  
 from Nancy Ann Hart  
**Fred Leopold**  
 from Dr. & Mrs. James  
 McKenna  
**Marcia & Robert Moses**  
 from Margaret Wiginton  
**Nora Napolitan**  
 from Jacquetta Napolitan

*Gifts in this list arrived in Fiscal Year 1998 through the first quarter of FY 1999. Gifts in recognition of others are always welcome and will be recognized.*

**Yes! I'll support DRIS's important work with a tax-deductible contribution.**

Name \_\_\_\_\_ Address \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_  
Day Phone \_\_\_\_\_ Evening Phone \_\_\_\_\_

_____ \$1,000	Benefactor	_____ \$100	Sponsor a receiver
_____ \$500	Patron	_____ \$75	Supporter
_____ \$250	Day Sponsor	_____ \$50	Subscriber
_____ Other	_____	_____	Matching gift form enclosed

Visa/Master Card # \_\_\_\_\_ Exp. Date \_\_\_\_\_

Signature \_\_\_\_\_

Check or money orders should be made payable to **"WSU--DRIS #4-44697."**

This gift is in: \_\_\_\_\_ honor of / \_\_\_\_\_ memory of: \_\_\_\_\_

Consider making a major gift or adding DRIS to your will. Your generosity can help make DRIS available for others. Please send me information about:

\_\_\_\_\_ sponsorship \_\_\_\_\_ planned giving \_\_\_\_\_ volunteer application \_\_\_\_\_ listener application

**Return to DRIS: c/o WDET-FM, 4600 Cass Avenue, Detroit, MI 48201**

Winter 1998/99

[WSU Code: 3563 H 2302 PRNT FY99]

The *DRIS FOCUS* is published quarterly and mailed to listeners, donors, and volunteers of the Detroit Radio Information Service (DRIS). It is produced by DRIS interns. Executive Editor is Kim Walsh.

DRIS is a 24-hour, closed-circuit radio broadcast service of WDET-FM, Wayne State University. More than 140 volunteer readers provide access to newspapers, magazines, and consumer information for people who cannot see or hold or comprehend conventional printed matter because of a disability. Offices are located at 4600 Cass Avenue, Detroit MI 48201; phone: (313) 577-4146; Program Hotline: (313) 577-4207. Business hours: 8:30 a.m.-5:00 p.m., Monday through Friday.



Wayne State University

**Detroit Radio Information Service  
for the Blind and Print-Impaired  
c/o WDET-FM, 4600 Cass  
Detroit, MI 48201  
ADDRESS CORRECTION REQUESTED**

# What Is DRIS?

The Detroit Radio Information Service (DRIS) is a closed-circuit broadcast service created for blind and print-impaired individuals. Its mission is to make printed material and other information accessible to people who cannot read on their own.

DRIS provides the reading of more than 100 current publications and produces programs that contribute to the well being of people with disabilities. Its programming helps people who are at risk of becoming isolated, participate more fully in the community and have equal access to timely information. Four staff members, student interns and more than 100 volunteers make the service possible.

DRIS is on the air 24 hours a day, seven days a week. The broadcast signal is sent over a subchannel of public radio station WDET-FM, Wayne State University. Broadcasts cannot be picked up on a regular radio; a pre-tuned single-frequency radio receiver is necessary. DRIS is also available on cable in some communities.

# What Programs Are Offered?

DRIS offers the reading of local and national newspapers and magazines, entertainment and TV listings, public service announcements, short stories, drama and a variety of other information. Grocery and

department store advertisements and circulars help listeners make important consumer decisions without relying on family members and friends. Special programs also provide information about employment, rehabilitation, hobbies, legislative decisions, other agencies and special events. DRIS simulcasts the Descriptive Video Service (DVS) narrations from some public television programs.

DRIS also operates a Personal Reader Referral Service which helps match volunteer readers with individuals who require assistance reading personal correspondence, bills, and other materials not available on tape.

A sampling of publications read include: *The Detroit News*, *the Detroit Free Press*, *Crain's Detroit Business*, *The Observer & Eccentric*, *The Wall Street Journal*, *The New York Times*, *Cosmopolitan*, *Time*, *Newsweek*, and *People Magazine*.

# Who Is Eligible?

Any person who is unable to see or hold or comprehend conventional printed matter because of a disability, including learning disabilities, is eligible. An applicant must be (1) registered with a library for the blind and physically handicapped or (2) certified by a qualified professional such as a doctor, social worker or rehabilitation counselor. DRIS is also available for institutional use if the establishment serves qualified individuals. It can be used in community areas or be piped to rooms.

# How To Apply

A prospective listener should request an application from the Detroit Radio Information Service by calling WDET-FM, (313) 577-4146 or returning the attached tear-off form. Each person whose certification is verified will be eligible for a receiver as they are available.

# Is There A Fee?

The closed-circuit receivers are loaned free of charge to listeners and must be returned when no longer of use.

While borrowing a receiver does not depend on a financial contribution, DRIS counts on listeners for donations to help offset operational expenses. The suggested giving level for listeners is \$50 annually. This tax-deductible gift is less than one-half the subscription price of a single daily newspaper. DRIS is an exceptional value for the cost.

Checks or money orders should be made payable to "WSU-DRIS #4-44697."

# Funding

Financial support for DRIS comes from foundation grants, civic and religious groups, corporate and business sponsorship, special events, and the generosity of concerned individuals.

City: \_\_\_\_\_

State: \_\_\_\_\_  
MSU Code: \_\_\_\_\_  
Zip: \_\_\_\_\_

## You Can Help!

- Volunteer your time or services.
- Send your tax-deductible contribution to DRIS, a non-profit radio reading service of WDET-FM.
- Contact your doctor, clergy and friends to acquaint them with DRIS.
- Invite a DRIS representative to address a social or professional group in which you are a member.

## More Information?

For more information about the Detroit Radio Information Service (DRIS) call WDET-FM, (313) 577-4146; FAX (313) 577-1300 or write:

**The Detroit Radio Information Service  
c/o WDET-FM  
4600 Cass Avenue  
Detroit MI 48201**

*To hear an audio version of DRIS' program schedule call the "Program Hotline" anytime, (313) 577-4207.*

**This brochure courtesy of:  
Michigan Consolidated Gas Company  
and Info-Grafx, Inc.**



**Detroit Radio Information Service  
c/o WDET-FM  
4600 Cass Avenue  
Detroit, MI 48201**



## Hear Here.

**dris**

DETROIT  
RADIO  
INFORMATION  
SERVICE



A radio reading and  
information service for the  
blind and print-impaired

*DRIS is a subchannel service of  
Public Radio station WDET-FM,  
Wayne State University, Detroit*