

I applaud the FCC's decision to pursue LPFM licensing. Especially since the 1996 Telecommunications Act, the public airwaves have become dominated by a small oligopoly of broadcasters. LPFM represents our best hope of returning diverse programming to the air and recapturing a measure of local control. With those two goals in mind, let me offer the following suggestions:

1) LICENSED LPFM STATIONS SHOULD BE NON-COMMERCIAL ONLY. This is the best way to assure that they will not also become dominated by the same narrow types of lowest-common-denominator programming currently available through large FM stations. Since the FCC is legally incapable of regulating content, taking LPFM stations out of the commercial marketplace is the best way to assure that they will not fall victim to the same economic forces operating on standard FM stations.

2) ERR ON THE SIDE OF PROVIDING MORE LICENSES. Reflecting very real concerns about interference with current stations and translators, the proposed regulations are very conservative in the number of LPFM licenses to be granted. There is a very real trade-off here; there is always a danger of crowding out existing frequencies. But I think this danger has been overstated by the FM industry and the proposed regulations are too conservative in this regard. Try to resist the more extreme fear-mongering about the quality of the broadcast signal. At any rate, very few listeners take advantage of the high quality of FM signals; most use low-quality receivers such as walkmen. And new satellite and digital technologies will soon render even high-quality FM broadcasting something less than state of the art in these ways.

3) PROVIDE STRONG COMMUNITY ACCESS GUIDELINES FOR LPFM LICENSEES. Even with maximum number of LPFM stations and the protection provided by non-commercial licenses, many local voices will have difficulty getting airtime. There is simply not enough FM bandspace for everyone to get a spot on the public airwaves who might want one. Therefore, many community broadcasting advocates are urging regulations that would require community access to microradio stations. We can share our public airspace through such community access regulations.

If LPFM licenses are enacted in these ways, I am convinced they will infinitely enrich the options available to the public on our airwaves.

Thank you for receiving my comments,

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