

MM Docket No. 99-25
Low-Power FM Radio Proposal

The case for establishing a Low-power FM radio service

The proposal put forth by the FCC regarding the establishment of a Low-Power FM (LPFM) service has great potential to change the face of US FM broadcasting as it exists today. There are many concerns at stake, both commercial and those that affect free speech. It is important that we consider the LPFM proposal carefully with an eye toward the difficulties that could result if, once opened, LPFM turns out to be a Pandora's Box.

Benefits for rural listeners

There is a significant segment of the US population that could be well served by providing additional choices in FM stations. Based on population information from the FCC web siteⁱ the total population in the 60 largest US cities is 38,178,400. Current US census informationⁱⁱ indicates that there are about 272 million US residents. This leaves over 230 million people living outside the boundaries of the 60 largest US cities. Noting the small number of urban 1000-watt stations allowed under the current LPFM proposal, 230 million people could be served on a non-interfering basis by the LPFM service. If one takes the more conservative approach using US Census population figures for those outside metropolitan areas the number is *still* significant at just over 53 million people. Based on this information coupled with my own observations I contend that there is enough open spectrum to allow a significant portion of the population to be well served by low power FM broadcast stations without interfering with existing local broadcast stations.

LPFM could be a way of extending the range and utility of the Internet by allowing microbroadcasters to carry program content from across the world. In my own community of Watertown, South Dakota there are a large number of people who have emigrated from Mexico and China. Neither group is currently served by local native-language radio or television channels. Microradio could provide a means for these groups and others like them to hear information and music in a language that they can easily understand. Our geographic region is subject to storms that have produced numerous tornadoes. Microradio could serve as a means of warning local residents *in their native language* of an approaching storm. Can you imagine driving along in your car and hearing a warning siren but not being able to understand the safety instructions broadcast on the radio?

The internet provides information on a nearly instantaneous basis across the globe. Assuming that an LPFM station could secure the appropriate copyrights, why not allow

that station to rebroadcast internet-conveyed election returns, sporting and other events to a local area where interest exists? It seems to me that this is the charter of microbroadcasting, which in this sense provides a service to a small geographic region but also content of interest to a narrow segment of the populace.

Some of the broadcast stations in our area do not provide very much locally originated content. To reduce their operating costs they receive their content by satellite and provide only local time and weather announcements. In my opinion, they have not lived up to the original intent of their broadcasting license - to serve a regional population by with information relevant to the local population.

If there are no technological barriers involved, why shouldn't people in rural locales have more FM stations to choose from? Even though LPFM stations could serve only a few hundred people in remote areas, a newspaper with a circulation of 50 is still a valid publication so the same should apply to FM radio. Cable TV and direct broadcast satellite services have leveled the playing field in terms of choices available to TV viewers. LPFM could do the same for the FM radio service.

The impact of digital radio

Why not allow or encourage the new LPFM stations use digital broadcast technology? Doing so could spur the acceptance of the new technology and at the same time take advantage of its spectrum-conserving capability. The new digital technology would grow more quickly in popularity if it allowed listeners to access new stations. If digital broadcasting does nothing besides improve the signals of existing stations it will suffer the same fate as AM stereo, which was a technical improvement but a marketplace failure.

Disadvantages, problems and solutions

The creation of the LPFM service is certainly has its drawbacks. Probably the two most serious issues are interference and regulation. The current FCC staff could not hope to deal with the regulation problems unless the LPFM service was largely self-policing. The amateur radio service survived a similar struggle when 2-meter VHF repeater frequencies became scarce. Amateur radio groups managed their own difficulties by creating coordination committees and working out interference issues to a level acceptable to almost all users of that spectrum. I think it is reasonable to assume that a similar method of regulation would work with an LPFM service.

Another serious issue is the erosion of the market currently enjoyed by broadcasters in the FM spectrum. High operating costs have driven many stations to cut back on their on-air staff and rely on less expensive non-local content. LPFM could dilute the number of listeners by fragmenting the listening population. On the other hand, it could encourage listeners to tune into radio more often, encouraging them to forego competing technologies such as CDs and cassette tapes. Many people assumed the VCR would spell the end of local cinema when in fact the opposite turned out to be true. LPFM could have

the effect of revitalizing a stagnant medium, especially if it can take advantage of the new digital technology.

I have the advantage of reading some of the comments already filed with respect to the LPFM proposal. The two major areas of concern in the comments I have read are centered on interference to- and loss of listenership by- existing broadcast stations. I am confident that good engineering practices will solve interference issues. This, and the popularity of a revitalized FM service can address the loss of listeners should quell the majority of concerns, leaving the way clear to the establishment of an LPFM service.

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ⁱ From the FCC web site: http://www.fcc.gov/Bureaus/Mass_Media/Notices/1999/fcc9906a.xls

ⁱⁱ From the US Census web site: <http://www.census.gov/population/projections/nation/npaltsrs.txt>