

I am writing to say that I am in favor of licensing new low power radio stations, and of establishing a class of "microradio" stations.

I am concerned about one aspect of the proposal. From <http://www.fcc.gov/mmb/prd/lpfm/>:

* THE FCC IS NOT PROPOSING TO LICENSE RADIO "PIRATES." The FCC has proposed to apply the same character qualifications to LPFM broadcasters that apply to full power broadcasters. The character qualifications, if adopted, may disqualify license applicants who have intentionally and persistently violated longstanding prohibitions against unlicensed broadcasting. Where unlicensed broadcasters persisted in operating after the Commission took action against them, the Commission has proposed that those broadcasters be deemed per se unqualified for LPFM licenses. The Commission, however, seeks comment on whether illegal broadcasters who ceased operation after being advised of an enforcement action should be eligible for LPFM licenses.

I am concerned that this rule could be used to disqualify people who ought to be entitled to an FCC license. If an individual or organization, in the past, before it was at all possible to obtain such a license, engaged in acts of civil disobedience by broadcasting a "pirate" station, that individual or organization should be commended for keeping the issue alive and forcing the FCC to consider granting such licenses. It is not just to punish such individuals and organizations by denying them access to the fruits of their labor.

If such individuals or organizations persist in broadcasting without a license even after reasonable terms are adopted for the issuance of low power and micropower licenses, then I believe that such an exclusionary rule may be considered.

In other words, only those people who ignore FCC warnings *after* there was any reasonable means for them to obtain a low power license (at low cost and low bureaucratic hassle) - i.e. after any current proposals may be adopted - should be excluded.

Thank you for providing a forum for citizens to easily voice their concerns (i.e. doing so electronically). I have never before sent any type of similar comment to the government, and would have been extremely unlikely to do so without the ease of doing it electronically.

- Richard Fromm
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