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Many broadcasters are now using program origination services. These services are some times called "satellite radio" due to the typical nature of the distribution methodology. There is also a growing trend to carry programs, regardless of format, that is produced outside of the community in which the program airs. Understandably, this trend is driven largely by the desire on the part of the broadcast operator (licensee) to conserve financial resources.

This trend makes it more difficult for people in the community to have access to the person, or groups, that control the content of the broadcasts being heard in the community. This is true even in the face of the public comment file that must be maintained by the licensee. There can be a great deal of time between the filing of a comment with a licensee and the review of the public comment file during the license renewal period.

Advertising dollars are the fuel that keeps commercial radio running. For the most part, these dollars are allocated by advertisers on a national or regional basis and may be part of a co-op-advertising block. This means that a consumer has little, if any, avenue to influence the advertising dollars received by a particular broadcaster.

This trend toward centralization means that the voices of diversity are finding fewer and fewer outlets on which to be heard. The concept of neighborhood is being traded for globalhood. Neighborhoods, and neighborhood issues, are still important. When the voice of a neighborhood is stilled tension and frustration are the results.

Non-commercial radio provides a partial answer to the problem, but not a complete one. These operations are restricted to a small percentage of the band leading to overcrowding. Those non-commercial operations that are owned by educational institutions, at least in our area, are typically NPR stations. For a very large percentage of the day, these stations carry NPR. This, again, is centralization of content.

Community radio comes closer to the answer. In our area, KKFI (90.1) is the community radio station. It is the 100,000-watt voice of our metropolis. As good as the station is, it is *the* community radio station for a community of several million persons. At one point, I was honored to serve as the stations technical director. I observed, first hand, the frustrations of scheduling the programs produced by community groups. There are only so many hours in a week to be made available as program slots. Even if your group manages to get a two-hour slot during the week, that slot may be in the dead of night when the majority of the members of your group are asleep.

The other difficulty with non-commercial operations is funding. Current regulations prohibit advertising. The sponsor of a program can only mention the sponsorship of a program, although this is being stretched to the limit on certain NPR and PBS programs. Indeed non-commercial operations need to remain non-commercial.

The proposed expansion of commercial operations should address all of these needs. It will provide community based, and oriented, content. It will make the owners of the stations more responsive to the needs of the communities that they serve. Finally, it will provide local advertisers reasonably priced opportunities to disseminate their message.

The new stations must be operated under the same technical standards as normal broadcasters and abide by, largely, the same body of rules. As far as equipment goes, the important factor is the resulting emanations. If the signal can be generated to the published technical standards with due regard to such things as out of band radiation, harmonics, and the safety of the operator and the operation, then the exact nature or origin of the equipment being used should be of little concern. Type accepted equipment wrongly installed or operated might create as much, if not more, objectionable interference than non-type accepted equipment properly constructed, installed, maintained, and operated. The burden of proof of proper operation must rest upon the licensee. At the power levels proposed, adherence to the technical standards is easy and inexpensive.

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