

Dear FCC,

I wish to express support for the proposed 1-10 watt class of LPFM stations. I am the chief engineer of Catholic University Radio (Washington DC) and as such understand the advantages of such an LPFM service. In urban areas, where the FM spectrum is crammed with high power stations there exist small geographic "pockets" of free spectrum on certain frequencies in our area which can fit a low power FM station, but not a full power station. In order to allow more public access to the radio spectrum in our area (the commercial radio in the DC area is fairly homogenous and not community-oriented, as a result of mass corporate buyout of locally owned stations after deregulation in 1996) a locally run radio service needs to be established. The universities are good candidates for such a service; town governments, churches, and community centers would be ideal candidates also. In short LPFM licenses should be granted to anyone who can demonstrate a relative degree of permanency required to establish a community station. Likewise ownership rules should be established to keep ownership local, and to prevent mass buyouts of such stations.

The National Association of Broadcaster's (NAB) objections to the LPFM service based on interference to established stations is bogus; very stable and spectrally clean transmitters are becoming very affordable now. The cheapest transmitters I have seen that could be used for such a service cost well under \$500 and have spurious outputs and harmonics 50 dB below the carrier; 50 dB below 1 or even 10 watts is absolutely negligible a few meters from the transmission antenna. Adjacent channel interference is not an issue either; in most cases a LPFM station will get "drowned out" by a high power station on an adjacent channel. It is beneficial to the LPFM broadcaster to select a frequency as far as possible from a high power station to allow the LPFM station to be heard, not just to minimize interference with full power stations.

Finally, such a service is very much needed for reasons of content on the radio spectrum. After deregulation of the radio spectrum in 1996 many large market locally run stations were bought out by large companies. Minority and local ownership of stations has decreased drastically, and the quality of radio programming has subsequently suffered. It is much more difficult now for the public to have access to the medium of radio to express views and promote local creativity (through music or otherwise). In fact many people feel that radio is now a medium totally detached from the local community; it is a never ending commercial for the products of large record companies and a politician's tool for forming public opinion. Such trends should be reversed for the health of the medium as a whole, lest the medium become irrelevant as people turn to the internet to express opinions and promote creativity. Our college radio station, which cannot serve the community outside of the university since it is carrier current, tries to promote local music. However, many local artists are now bypassing radio as a whole and are turning to local music websites to promote themselves. Unless a method to re-establish a community oriented presence on the radio spectrum is realized I believe that radio as a whole will become (and has already become) irrelevant banter.

The FCC has taken a lot of heat by proposing an LPFM service, mainly from the NAB. However the NAB and the media conglomerates it represents should not be the chief influence on the rulemaking process. The fact that it has been has tarnished the image and purpose of the FCC. The airwaves are public domain, not corporate domain, and I believe a LPFM service is in line with the notion of giving the public access to the airwaves.

David Kolesar
Chief Engineer, Catholic University Radio (Washington, DC)