

Before the Federal Communications Commission

Comments on MM, 99-25

In the matter of creation of a Low Power FM Radio Service

We represent Shrewsbury Public Access Connection (SPAC), a community media center in Shrewsbury, MA.

SPAC's mission is to build community, empower individuals and insure First Amendment expression through the utilization of communication technologies. For over 12 years we have provided the Town of Shrewsbury with equipment, training and assistance in getting their voices heard and their messages out to the community through cable television and various other mediums. We operate under the basic access model of "first come, first served," and also actively seek to involve all segments of the community through our outreach programs. Our participants include churches, civic groups, the schools, Town agencies, and most important, individual citizens.

We would like to commend the FCC for its proposal to institute a Low Power Radio Service. Our organization is in support of the Prometheus Radio Project proposal to favor independent public access cable TV stations, community media centers, media arts centers, community youth centers, schools, public libraries and community organizations that agree to operate LPFM radio stations in accordance with the principles of Public Access.

In light of the relatively small number of licenses that will be feasible in major metropolitan areas, the advantages of a strong preference for Access style operations are many. Instead of serving one interest, an access station serves all interests that feel the need to communicate, and presents the audience with hundreds of new programming options on a single channel. There are many individuals, organizations and interests in society that would find communication through a weekly radio show useful and important, but for whom the actual independent operation of an entire station would be unfeasible and useless. These interests are well served by access style radio stations.

As an organization with 12 years of experience administering a public forum, we believe that we are uniquely qualified to administer this scarce resource in the public interest. If LPFM goes through without such a preference for the civic institutions devoted to freedom of communication, it is likely that the service that will emerge will merely serve the next few profitable demographics, rather than the entire civic culture. While we in principle have no objection to radio stations that serve one particular musical taste, religious grouping or organization, the advantage of access style operation of a radio station in a situation of spectrum scarcity is clear.

We believe the best method for administering this is through a six month first filing window, open only to organizations that certify that their operation will be in accordance with the principles of public access. Whatever method is utilized for choosing among applicants for LPFM, we hope that a strong preference will be established for licensees who operate in accordance with the

principles of public access.

Thank you for your consideration of our comments.

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