

July 30, 1999

TO: F.C.C.

On behalf of "Cultural Communications Network, Inc. ("CCN") we are pleased to comment on the above referenced Notice of Proposed Rule Making ("NPRM") by the Federal Communications Commission ("FCC or the Commission").

Cultural Communications Network, Inc. Supports the creation of new classes of service in the existing FM radio band. Low Power FM ("LPFM") will provide an affordable means of serving the underserved by the underserved. The cities of the United States that are within 250 miles of the Canadian Border and 250 miles of the Mexican Border can now have new service to such places. The needs of minority communities in urban areas can and should have an affordable method of serving the urban areas.

In Western New York only one outlet in the AM or FM Band is owned by minorities. The promise of a new service generates much hope and excitement. LPFM can meet many of the needs of the unserved urban community. In particular the need for news and public affairs. Many outlets have in the past used the minority community as the basis for applications to the F.C.C. to have a license but only one actually serves the minority community in Western New York.

CCN at this time endorsed LPFM service and states its intention to apply for a license if the new classes at service are approved by the Commission.

We (CCN) believe that the LPFM service should not be permitted to operate as a translator for full power stations. We (CCN) also believe that no full power stations should be licensed in the LPFM service. The service should be limited to not-for-profit organizations which must be allowed freedom to sell advertising.

The FCC should prohibit existing broadcasters from owning LPFM stations and should prohibit anyone from owning more than one LPFM station in the same community. In order to meet its goal of bringing ownership diversity to radio broadcasting, the FCC must ensure the diversity of owners among LPFM stations and ensure that LPFM brings new broadcasters to the airwaves to focus on local communities. Permitting existing broadcasters to enter the LPFM arena would be contrary to the FCC's diversity goal and would further entrench existing full-power broadcasters whose failure to address local community needs has brought about the need for LPFM. Also, allowing new LPFM broadcasters to control more than one LPFM frequency will limit diversity and allow fewer voices to be heard. Therefore, CCN supports these two diversity-enhancing ownership restrictions. Because the FCC is required by law to protect the radio broadcast spectrum from interference, and because the FCC has successfully lived up to that mandate for many years, we trust that the Commission will implement the creation of LPFM radio classes in a manner consistent with its record of excellent stewardship of

page two

Low Power Radio

MM Docket 99-25

July 30, 1999

the airways and with the superlative talent and integrity of the current leadership of the Commission.

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