

**To: The Commission**

**Comments of Minnesota Public Radio**

Minnesota Public Radio (MPR), a non-profit company, respectfully submits these Comments in response to the above-captioned Notice of Proposed Rule-Making (NPRM).

MPR is the licensee of 29 FM stations, 1 AM station and 18 translators, primarily in the State of Minnesota and its border communities. In most communities in which it is present, MPR provides its listeners with dual streams of programming on two separate stations: one of arts and performance programming, including classical music; the other of news and information programming. MPR brings to our listeners unbiased local, regional, national and international news and cultural programming from its own studios located throughout the State of Minnesota and from the studios of National Public Radio, the British Broadcasting Corporation, the Canadian Broadcasting Corporation, producers for Public Radio International, and many other producers and distributors from around the US and the world.

In addition to our studios and main newsroom in Saint Paul, MPR maintains offices at the Minnesota State Capitol in Saint Paul and at Minneapolis City Hall, and studios with reporters in several Minnesota cities ranging from mid-sized Rochester to tiny Worthington, MN.

MPR is also the largest producer of nationally distributed public radio programming in the country, providing more than 180 hours of programming each week to public radio stations and their listeners throughout the nation. Such MPR creations as *A Prairie Home Companion*®, *Saint Paul Sunday*®, and *Pipedreams*® are standard fare for public radio listeners from Vermont to Guam.

The stated mission of Minnesota Public Radio is to "...enrich the mind and nourish the spirit through radio, related technology, and services. We will enhance the lives and expand the perspectives of our audiences, and thereby assist them in strengthening their communities." MPR takes this role seriously, and is dedicated to providing a public service to the communities in which it operates.

Throughout its 32-year history, MPR's innovative vision has carried the public broadcasting industry in exciting new directions.

Listeners rely on MPR News for multiple perspectives, insightful coverage, and in-depth analysis of critical issues. In fact, MPR's News & Information stations are the most trusted news source in the region, according to an independent survey of media users.

From the north woods of Minnesota to the heart of the Twin Cities metro area, listeners find cultural enrichment and awareness in MPR's classical music programming and commentary. MPR's library of more than 40,000 CDs and LPs is supplemented by live concert performances and special programs with local, national, and international guest artists.

Membership makes up the single largest source of revenue in MPR's budget. MPR's 88,000 contributors create by far the largest membership base of any public radio network in the country. In addition to their financial contributions, MPR listeners contribute more than 13,000 hours of volunteer work each year to support the programming they value.

Because MPR's listeners have responded with such expressions of support, MPR has engaged in an effort to assure that its radio signal is available, and remains available, to listeners in its coverage area.

As we stated in Comments filed in April 1998 in RM-9208/9242/9246, MPR strongly believes that while availability of the airwaves should not be limited only to those with deep pockets, whatever proposals are adopted by the Commission need to assure that good engineering practices are maintained to protect the integrity of existing licensees. Creating a new class of service that would undermine the integrity of existing classes of services should not be a goal of the Commission or a result of Commission attempts to achieve other goals. Unfortunately, MPR believes that the LPFM proposal set forth in the NPRM has a strong likelihood of undermining existing licensees, particularly public broadcasters.

MPR is a signatory to another set of Comments filed in this proceeding by a number of our public radio colleagues (those Comments are filed in this proceeding by MPR, Rocky Mountain Public Radio, West Coast Public Radio, Eastern Public Radio, California Public Radio, Public Radio in Mid-America and Southern Public Radio, collectively referred to as the "Public Radio Regional Organizations", or "PRROs".) The PRROs Comments contain a lengthy and detailed explanation of our concerns and will not be repeated in these Comments. Instead, these Comments will focus in on our particular concern regarding the effect LPFM may have on the services provided by public broadcasters for the blind and print disabled.

MPR strongly supports the Comments filed in this proceeding by International Association of Audio Information Services (IAAIS), formerly known as the National Association of Radio Reading Services. IAAIS is quite concerned that LPFM will destroy the services to the blind and print disabled that are generally available on the FM subcarriers of public broadcasters such as MPR. Radio reading services on FM subcarriers provide a single, vital link to the larger world for those who suffer from disabilities that impair access to printed material. The Internet and cable television are not viable alternatives to these services for many blind and print disabled people in the United States; the subcarrier service is the only viable alternative for millions of blind and print disabled people.

MPR has a particular interest in these services, which now includes reading of daily local, regional and national newspapers and magazines, as well as books, because Minnesota was the first state to initiate a radio reading network. This initial program, in 1969, was designed by MPR and Minnesota State Services for the Blind and Physically Handicapped (now known as the State Services for the Blind). A number of MPR's FM subcarriers around the State of Minnesota are used by State Services for the Blind and we know their clients highly value the service. It is a service that noncommercial broadcasters are now required by FCC regulations to provide upon request - a service that we would very much like to be able to continue providing to our communities.

The NPRM is devoid of any reference to studies of the impact of LPFM on FM subcarriers. In fact, the use of FM subcarriers by existing stations is not mentioned at all in the NPRM or on the Commission's LPFM website. Neither the proponents of LPFM, nor the Commission, appear to have studied the issue of LPFM impact on FM subcarriers. MPR urges the Commission not to adopt LPFM without a thorough study of the impact of LPFM on this vital, locally-oriented service.

MPR therefore urges the Commission to not move forward at this time with the LPFM proposal as set forth in the NPRM for all the reasons set forth in the PRROs Comments and in these Comments.

Respectfully Submitted on behalf of Minnesota Public Radio,

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